

## Heckington Fen Solar Park

EN010123

### Appendix 16 Statutory Consultation – Written Responses under Section 42 of the Act & How Ecotricity responded

Applicant: Ecotricity (Heck Fen Solar) Limited

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**CONSULTATION REPORT – APPENDIX 16 – STATUTORY CONSULTATION – WRITTEN RESPONSES UNDER SECTION 42 OF THE ACT & HOW ECOTRICITY RESPONDED**

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# Appendix 16 Statutory Consultation – Written Responses under Section 42 of the Act & how Ecotricity responded

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## 16.1 Introduction

This document provides a full record of all the responses from individuals or representatives from various organisations that provided a response to the section 42 consultation. It comprises comments submitted via email, as well as one detailed feedback form response (from Historic England). That response is also provided in **Appendix 18**, as the respondent provided additional feedback via the multiple-choice tick boxes in their form. This **Appendix (16)** also details how Ecotricity responded to all these responses.

Five of these responses were provided shortly after the statutory consultation period closed – one on 2 September 2022, three on 6 September 2022, and one on 22 September 2022 – but we have responded to them below.

## 16.2 How Ecotricity responded

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 2, EIA methodology	North Kesteven District Council	1 September 2022	We identify that the 'cumulative effects' sections of the ES will need to refer to and discuss/evaluate where necessary cumulative effects and impacts associated with the proposed South Lincolnshire Reservoir (SLR) and the Temple Oaks solar park NSIP. The latter was submitted to PINS after the preparation of the PEIR and whilst we identify that cumulative effects are likely to be limited to specific chapter headings (potentially in relation to a proposed BFSS grid connection, and agricultural land impacts) nevertheless the ES will need to consider Temple Oaks as a 'reasonably foreseeable project' mindful of its status as a registered NSIP scheme.	The Applicant notes this comment. They will consider the Temple Oaks Renewable Energy Park project and the SLR in relation to cumulative effects. Detail for the SLR is limited, but publicly known information has been considered within the cumulative assessment.
Chapter 2, EIA methodology	North Kesteven District Council	1 September 2022	Whilst the preferred location of the SLR has yet to be formally announced, as you know North Kesteven District is located within the overarching site selection/catchment area set out in the 'Strategic Solution Gate One Submission: Preliminary Feasibility Assessment'. The SLR will in due course be registered as an NSIP project and Figure 5 of the Gate One submission shows a probable (operational) project overlap with the Heckington Fen Solar Park. We would recommend that you maintain dialogue with Anglian Water in this regard.	The Applicant notes this comment. They will continue engaging with Anglian Water about the preferred location of the South Lincolnshire Reservoir (SLR). The proposed location at Swaton has been considered within the cumulative assessment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 2, EIA methodology	North Kesteven District Council	1 September 2022	<p><u>2.6, 2.12, 2.12.19, Figure 2.2</u> (and other references to ‘cumulative effects’) Please note that the Temple Oaks Solar Farm has been accepted as an NSIP project by PINS and a request for a Scoping Opinion has been submitted. This post-dates the Scoping Opinion issued in relation to Heckington however the project will need to be accounted for where applicable in the consideration of cumulative effects. A grid connection is proposed into the north eastern corner of BFSS via an indicative cable corridor along the A52. Depending on the timescale for the project and the precise location of grid connection and the corridor route there is the potential for some potential cumulative construction impacts and potentially BMV land impacts alongside the other NSIP solar farms proposed in West Lindsey, SKDC/Rutland and Bassetlaw. Cumulative LVIA impacts associated with the construction of the solar farm (as opposed to the grid connection route) are likely to be minor/negligible given the degree of separation between the sites and the variable intervening topography however for completeness it is advisable that the LVIA chapter briefly assesses whether cumulative LVIA impacts are likely (noting the proposed 3km cumulative effects LVIA search area in table 2.7). Whilst the Scoping Report for Temple Oaks presumes that the entire site is class 3b non-BMV land it is unclear whether this is informed by a full ALC. Parts of the site are brownfield and potentially contaminated by former uses. If a detailed ALC is not available at the point of finalising the ES, the Heckington Fen ES might</p>	The Applicant notes this comment. They will consider the Temple Oaks Renewable Energy Park project in relation to cumulative effects and it will therefore be assessed within the relevant environmental assessment topics of the Environmental Statement (ES).

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			therefore adopt an indicative proportion of BMV within the Temple Oak site for the purposes of assessing cumulative BMV land impacts alongside the West Lindsey, Bassetlaw and SKDC/Rutland sites.	
Chapter 2, EIA methodology	North Kesteven District Council	1 September 2022	<p><u>2.12.14</u>  This paragraph notes that a 'Zone of Influence' (ZoL) for each environmental topic area has been identified based on the extent of likely effects as identified as the study area in each of the individual topic chapters (Chapters 6 - 17) of this PEIR however that PINS also made the request that other NSIP schemes should be considered within the cumulative assessment to determine whether regional scale likely significant effects could occur with other large scale solar projects, which in the case of land use and agricultural impacts must therefore go beyond the 'Energy Park and adjoining agriculture land where relevant' ZoL in table 2.7. As above this should now include the Temple Oaks scheme.</p>	The Applicant notes this comment. They will consider the Temple Oaks Renewable Energy Park project in relation to cumulative effects and has been considered within Chapter 16: Land Use and Agriculture of the ES.
Chapter 2, EIA methodology	North Kesteven District Council	1 September 2022	<p><u>2.12.21</u>  The paragraph acknowledges that a new South Lincolnshire Reservoir is currently being proposed by Anglian Water and Water Resources East however that the final location for the new reservoir has not been revealed. The paragraph notes that at the time of preparing the PEIR the new South Lincolnshire Reservoir has not therefore been considered as part of the long list or short list as no formal details are available at this time. The PEIR notes that the 'long list' will be kept under continual review up until the point of determination of the application.</p>	The Applicant notes this comment.

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			<p>The publicly available strategic-solution-gate-one-submission-preliminary-feasibility-assessment-south-lincolnshire.pdf (anglianwater.co.uk) document notes in Section 7 that it is proposed that the SLR will be promoted as a Nationally Significant Infrastructure Project (NSIP), requiring a DCO under the Planning Act 2008. The reservoir’s abstraction and transfer infrastructure and related highways and other development would also be consented as part of the DCO, as “associated development” (as defined in the 2008 Act) and that the associated A2AT transfer infrastructure could be consented either as an integral part of the SLR DCO, as a separate DCO or as a non-DCO project. The ‘key activities and decisions’ section of the document confirms four public consultations (CON1-4), with the first completed in spring 2022 (CON1) to consult on the preferred site and help inform the concept design and that the DCO application is planned for Spring 2025 submission.</p> <p>The construction programme sets out a potential start date within Asset Management Plan period 8 (AMP8) with a potential start date of 2027 and, with an estimated site programme of eight years, an earliest possible deployable operation date of 2035. Whilst the preferred location of the SLR has yet to be announced (and therefore at this stage we agree that the scheme sits within ‘tier 3’ of PINS advice note 17, table 2 ‘assigning certainty to ‘other existing development and/or approved development’), we would recommend</p>	<p>The Applicant notes this comment.</p> <p>They will continue engaging with Anglian Water about the preferred location of the South Lincolnshire Reservoir (SLR). At this time the location is around Swaton and this has been used within the</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			that the applicant maintain dialogue with AWS given that this is a 'reasonably foreseeable' project with potential cumulative impact assessment implications depending on the choice of preferred site.	cumulative assessment.
Chapter 2, EIA methodology	Lincolnshire County Council	6 September 2022	<p><u>Cumulative Effects Approach</u></p> <ul style="list-style-type: none"> <li>Paragraph 2.12.14 &amp; Table 2.7 - A 'Zone of Influence' for each environmental topic area is identified however PINS confirmed in their Scoping Opinion Decision that other NSIP schemes should also be considered within the cumulative assessment to determine whether regional scale likely significant effects could occur. In the case of 'Land use and agricultural impacts' the 'Zone of Influence' will therefore go beyond that specified and so should be updated to take into reflect this as well as any other topics where there is the potential for cumulative impacts to be arise.</li> </ul>	The Applicant notes this comment. The ES has considered the cumulative nature of solar farms on the Best and Most Versatile (BMV) land in the county, which can be found in Chapter 16 of the ES. The 'Zone of Influence' has been updated accordingly.
Chapter 2, EIA methodology	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Paragraphs 2.12.15 &amp; 2.12.22 inc. Table 2.8 and Appendix 2.3 – no reference is given to the Temple Oaks Solar Park which is another NSIP project within the County. This should therefore be added and taken into account as part of the final ES. As part of the Temple Oaks Solar Park a grid connection is also being proposed into the Bicker Fen Sub Station via an indicative cable corridor that runs along the A52. Depending on the timescale for the project and the precise location of grid connection and the corridor route there is the potential for some cumulative construction impacts and also BMV land impacts alongside the other NSIP solar projects that are</li> </ul>	The Applicant notes this comment. The ES has considered all known relevant schemes within the cumulative assessment which has in turn followed on into other topics in the ES. Communications have been ongoing with NKDC & LCC to

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			currently being proposed in West Lindsey, South Kesteven/Rutland and Bassetlaw. For completeness it is therefore advisable that the LVIA chapter assesses whether cumulative LVIA impacts are likely and also any cumulative BMV land impacts.	ensure that sites within the cumulative assessment are robust.
Chapter 2, EIA methodology	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Paragraph 2.12.21 -the location of the new South Lincolnshire Reservoir has not yet been revealed and so whilst LCC understands and accepts that consideration of this potential development is not included at this stage, it is a reasonably foreseeable project. A decision on the location of the reservoir is expected to be announced in 2022 and so it is recommended that you maintain dialogue with Anglian Water Services and PINs so that any potential cumulative impact implications are assessed and considered as part of the final ES.</li> </ul>	The Applicant notes this comment. They will continue engaging with Anglian Water about the preferred location of the South Lincolnshire Reservoir (SLR). At this time the location is around Swaton and this has been used within the cumulative assessment.
Chapter 2, EIA methodology	Lincolnshire County Council	6 September 2022	<p>LCC’s appointed Landscape Consultants (AAH consultants) have also provided the following comments in relation to this specific chapter. A full copy of their comments is attached to this response should therefore also be read in conjunction with this response.</p> <ul style="list-style-type: none"> <li>At this stage, we do not have details on the final location and appearance/extent of taller/larger elements that form part of the development. Section 2.4 of the PEIR explains that the design parameters of the development are provided within chapters 3 and 4,</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The ES has defined the maximum parameters of all elements of the</p>

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			<p>and Paragraph 2.4.3 states: “Where flexibility is required, guidance produced by the Planning Inspectorate with regard to the use of the ‘Rochdale Envelope’ approach has therefore been applied within the EIA to ensure a robust assessment of the likely significant environmental effects of the Scheme. This involves assessing the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained, recognising that the worst-case parameter for one technical assessment may differ from another”. While this is a reasonable approach for the solar arrays, we have concerns in regards to the larger and taller elements, and further comments are provided below on Chapter 4 of the PEIR.</p>	<p>Proposed Development. The ES includes a series of elevation plans (Figure 4.4-4.26 document ref: 6.4.4). The use of the Rochdale Envelope is considered in Chapter 4 – Project Development.</p>
Chapter 2, EIA methodology	Lincolnshire County Council (AAH Consultants)	6 September 2022	<p>Comments on the Development Parameters And Rochdale Envelope (Sections 2.4) are as follows:          -As stated in previous correspondence (refer to paragraphs 1 to 4 of AAH TM02), at this stage, we do not have details on the final location and appearance/extent of taller/larger elements that form part of the development. Section 2.4 of the PEIR explains that the design parameters of the development are provided within chapters 3 and 4, and Paragraph 2.4.3 states: “Where flexibility is required, guidance produced by the Planning Inspectorate with regard to the use of the ‘Rochdale Envelope’ approach has therefore been applied within the EIA to ensure a robust assessment of the likely significant environmental effects of the Scheme. This involves assessing the maximum (and where relevant,</p>	<p>The Applicant notes this comment. The ES has defined the maximum parameters of all elements of the Proposed Development. The ES includes a series of elevation plans (Figure 4.4-4.26 document ref: 6.4.4). The use of the Rochdale Envelope is considered in Chapter 4 – Project Development.</p>

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			<p>minimum) parameters for the elements where flexibility needs to be retained, recognising that the worst-case parameter for one technical assessment may differ from another.”</p> <p>-While this is a reasonable approach for the solar arrays, we have concerns in regards to the larger and taller elements, and further comments are provided below on chapter 4 of the PEIR.</p>	
Chapter 3, Site description, site selection and iterative design process	Historic England	20 July 2022	[Regarding the two indicative cable route options, we don't know if we prefer Option A or Option as] This cannot be established with regard to heritage issues until the planned walkover survey and potentially further investigation works have been completed.	The Applicant notes this comment. The Offsite Cable Route Corridor has been reduced to 1No preferred option, bar a small section near Bicker Fen substation, where there remain 2No options.
Chapter 3, Site description, site selection and iterative design process	Historic England	20 July 2022	[Regarding the Bicker Fen Substation works, we cannot comment as] This cannot be established with regard to heritage issues until the planned walkover survey and potentially further investigation works have been completed.	The Applicant notes this comment.
Chapter 3, Site description, site selection and iterative design process	North Kesteven District Council	1 September 2022	Whilst chapter 3 of the PEIR describes how the ES will address the issue of alternatives, unfortunately we consider that there is insufficient detail presented on the issue of alternatives to the current layout; including the overall scale of development. Whilst the scoping opinion fixes the overall search area for the assessment of alternative sites (which is mapped in the PEIR), regulation 14(2) of the 2017 Regulations notes that	The Applicant notes this comment.

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			<p>'scale' should be considered in the context of alternatives. We interpret this to incorporate reductions to the scale of development to respond to environmental constraints and in the consideration of avoiding or mitigating impacts. Whilst the PEIR identifies a number of iterations to layout, some of these have been made prior to the availability of the Kernan Countryside Consultants ALC report.</p> <p>As such, until recently, it had not been possible for the Council to review the mapped BMV areas against the site layout and we consider that the ES should therefore address (in the context of both the current overall 'scale' of development and a reduced scale of development) the issue of alternatives in relation to BMV impacts. This should include reducing the BNG areas in the southern and southwestern parts of the site which broadly correspond with Grade 1 and 2 BMV land to enable ongoing agricultural use mindful that a generous BNG of 200% is currently envisaged.</p> <p>The DCO submission also needs to update on the 28 July 2022 BEIS decision to refuse consent for the s36C variation application and clarify that this permission is now essentially time-lapsed.</p>	<p>They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p> <p>The decision by BEIS in July 2022 referred to the 2018 Variation. Although no formal decision has been issued by BEIS on the 2015 application, BEIS has advised that 'We do not, therefore, intend to consider</p>

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				the 2015 Variation application further'. The wind farm has not progressed for reasons that included the inability to overcome impacts on aviation radar. The wind farm is not assessed as part of the baseline for the Environmental Statement.
Chapter 3, Site description, site selection and iterative design process	North Kesteven District Council	1 September 2022	<p><u>3.2.18</u></p> <p>For the reasons set out below in relation to Chapter 16 we do not necessarily agree that the soils within the potential Biodiversity Net Gain areas will be unaffected. The issue is more the loss of opportunity for the meaningful continuance of agricultural activities on the higher grade BNG land and the limited information in the PEIR as to whether or how this will be secured for the lifetime of the project not least in light of the recent appeal decision APP/K2610/W/21/3278065 at Cawston, Norfolk.</p>	The Applicant has reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.
Chapter 3, Site description, site selection and iterative design process	North Kesteven District Council	1 September 2022	<p><u>3.4.3 onwards</u></p> <p>The paragraph notes Schedule 4 'Information for Inclusion in Environmental Statements' of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and that through Regulation 14(2) this should include a description of the reasonable alternatives (for example in terms of</p>	The Applicant notes this comment.

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			<p>development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. 3.4.4 confirms that the alternatives considered are the 'No Development' alternative; and alternative designs, locations and technologies.</p> <p>3.4.24 sets out a number of criteria which the applicant considers to be necessary in the consideration of the availability/suitability of alternative sites. Whilst these are noted not all of these are pre-requisites. Site/s don't necessarily need to be in the same ownership, the application site is in FZ2/3 and ergo the alternative could be (flood zone 2/3 sites are dismissed in the suitability of alternatives). A single alternative site in Swaton is identified and, in principle, the Council accepts the position that compared to the existing legal agreement in place with the landowner on the Heckington site, negotiating the necessary legal agreements between applicant and landowner can take over 12 months which would have had a delay in delivery of the Proposed Development on the alternative site.</p> <p>It is therefore accepted in principle that a similar timescale for delivery of an operational scheme might not be achievable although it would be helpful if the ES could set out the measures taken (and responses</p>	<p>The Applicant notes this comment.</p> <p>The 'Back Check &amp; Review' process within the ES considered sites of</p>

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			<p>received) in terms of seeking dialogue with the Swaton landowner over site availability. On that basis, whilst a number of the alternative site criteria are accepted, we disagree with the approach to site ownership and flood risk and therefore the applicant should revisit this point in the ES.</p> <p>Finally, whilst Table 3.1 summaries the main design layout iterations considered, the Council does not consider that this wholly addresses the Regulation 14(2) requirement of the alternatives to consider design, technology, location, size and scale. Table 3.1 sets out a timeline leading to various design iterations on the site but which does not account (at Non-Statutory Consultation Layout stage) for the availability of more detailed information on BMV land. None of the main design iterations in Table 3.1, or the associated paragraphs, discuss alternative layouts and an alternative scale of development which demonstrates how impacts on BMV land have been mitigated through layout or whether/how an alternative scheme of reduced overall scale (i.e. reduced MW output) including a reduction in the overall 'developed' area reduces BMV impacts. This includes reducing the extent of the BNG areas/habitat enhancement zones which broadly correspond with Grade 1 and 2 agricultural land on Fig 3.1 and 16.1 and, as an alternative, retaining some of that land for agricultural use. Whilst over 200% BNG is estimated, this needs to be set against the loss of opportunity to continue meaningful</p>	<p>multiple landowners and in FZ1/2 &amp;3.</p> <p>The Applicant has reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p>



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			<p>agricultural use in the BNG areas applying the conclusions in the Norfolk appeal decision referred to.</p> <p>On this basis the Council does not consider that the PEIR presents a comprehensive approach to the assessment of alternatives as required by Regulation 14(2).</p>	<p>The Applicant notes this comment. They have continued engaging with North Kesteven District Council &amp; LCC on this issue to develop the methodology used in the ES.</p>
Chapter 3, Site description, site selection and iterative design process	North Kesteven District Council	1 September 2022	<p><u>3.4.12 (and other references elsewhere)</u></p> <p>The DCO submission should update on the 28<sup>th</sup> July 2022 BEIS decision to refuse consent for the s36C variation application made under the Electricity Generating Stations (Variation of Consents) (England and Wales) Regulations 2013. Whilst the PEIR, which was prepared prior to the BEIS decision, recognises throughout that there are practical difficulties in addressing the radar mitigation requirement, the ES and DCO application must now clarify the status of the 66MW wind energy scheme mindful of the BEIS decision; namely that it is essentially time-expired.</p>	<p>The DCO submission reflects this decision.</p>
Chapter 3, Site description, site selection and iterative design process	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• Paragraph 3.2.18 – we do not agree that soils within the Potential Biodiversity Net Gain (PBNG) areas would be unaffected by the development. The soils within the PBNG area would effectively be sterilised and taken out of productive use for at least 40 years if not permanently given the land could be of enhanced botanical/ecological value and, in the case of the community orchard, well-established meaning it would</li> </ul>	<p>The Applicant notes this comment. The land will still be classified as agricultural land. The area underneath and around the panels is proposed to be</p>

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			<p>be unlikely the PBNG areas would be reinstated/restored following decommissioning of the development. It is therefore disingenuous to suggest the loss of BMV land would be limited to only that where the PV arrays are proposed as the actual loss would be much greater at around 313ha when you take into account the PBNG areas too (i.e. 252ha BMV within the solar array site and 61ha of the PBNG area).</p>	<p>managed with sheep grazing. The Applicant has also reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p>
<p>Chapter 3, Site description, site selection and iterative design process</p>	<p>Lincolnshire County Council</p>	<p>6 September 2022</p>	<ul style="list-style-type: none"> <li>Alternative Layouts (Table 3.1) - none of the main design iterations in Table 3.1 (or the associated paragraphs) discuss possible alternative scales for the development in order to reduce the impact on BMV land. LCC believes the ES should address and consider how an alternative scheme of reduced overall scale (i.e. reduced MW output and footprint) reduces BMV impacts. This was advised as necessary by LCC (and NKDC) as part of our response to the Scoping Opinion and without this the PEIR does not, in our view, present a comprehensive approach to the assessment of reasonable alternatives in accordance with Regulation 14(2) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. In our view reasonable alternatives could include reducing the extent of the BNG areas/habitat enhancement zones (which broadly correspond with Grade 1 and 2 agricultural land on Fig 3.1 and 16.1) and, as an alternative, retaining some of that land for agricultural use given that BNG at present is estimated to be over 200%.</li> </ul>	<p>The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p>
<p>Chapter 3, Site description, site</p>	<p>Lincolnshire County Council</p>	<p>6 September 2022</p>	<p>LCC's appointed Landscape Consultants (AAH consultants) have also provided the following</p>	<p>The Application notes this comment.</p>

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selection and iterative design process			<p>comments in relation to this specific chapter. A full copy of their comments is attached to this response should therefore also be read in conjunction with this response.</p> <ul style="list-style-type: none"> <li>• Paragraphs 3.2.5 and 3.2.10 provide a narrative on the process of refining the grid connection corridor from the site to the Bicker Fen National Grid Substation. We would expect this route to confirmed as part of the ES and if there are potential landscape and visual effects, these would be assessed as part of the LVIA.</li> </ul>	<p>The Applicant has since refined the grid connection corridor and publicly confirmed this. Potential landscape and visual effects will be assessed.</p>
Chapter 3, Site description, site selection and iterative design process	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• Paragraphs 3.2.11 and 3.2.12 provide a brief overview of the extension to the Bicker Fen National Grid Substation. We would expect this to clarified as part of the ES and if there are potential landscape and visual effects, these would be assessed as part of the LVIA. While it is understood the PEIR represents a moment in time, and layouts are evolving, Figure 2.1 - Indicative Site Layout (Revision H), has been assumed by AAH to be the most up to date layout. Therefore, it is assumed Figures 3-1 and 3.2 have been included to provide detail on the evolution of the layout based on consultee comments.</li> </ul>	<p>The Applicant notes this comment. They have since refined the grid connection corridor and publicly confirmed this. Potential landscape and visual effects will be assessed. PEIR figures 3-1 and 3.2 were included to provide detail on the evolution of the layout based on consultee comments.</p>
Chapter 3, Site description, site	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>• Paragraphs 3.2.5 and 3.2.10 provide a narrative on the process of refining the grid connection corridor from the site to the Bicker Fen National Grid</li> </ul>	<p>The Applicant has since refined the grid connection corridor</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
selection and iterative design process			Substation. We would expect this route to confirmed as part of the ES and if there are potential landscape and visual effects, these would be assessed as part of the LVIA.	and publicly confirmed this. Potential landscape and visual effects will be assessed.
Chapter 3, Site description, site selection and iterative design process	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>While it is understood the PEIR represents a moment in time, and layouts are evolving, Figure 2.1 - Indicative Site Layout (Revision H), has been assumed by AAH to be the most up to date layout. Therefore, it is assumed Figures 3-1 and 3.2 have been included to provide detail on the evolution of the layout based on consultee comments.</li> </ul>	The Applicant notes this comment. PEIR figures 3-1 and 3.2 were included to provide detail on the evolution of the layout based on consultee comments.
Chapter 3, Site description, site selection and iterative design process	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraphs 3.2.11 and 3.2.12 provide a brief overview of the extension to the Bicker Fen National Grid Substation. We would expect this to clarified as part of the ES and if there are potential landscape and visual effects, these would be assessed as part of the LVIA.</li> </ul>	The Applicant notes this comment. They have since refined the grid connection corridor and publicly confirmed this. Potential landscape and visual effects have been assessed.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	As a general comment we note that the design, bulk, scale, mass and external appearance of a number of the elements of infrastructure is still under review. Whilst the PEIR considers a worse case scenario of taller panels pending the outcome of flood risk modelling (but where we understand that standard panel heights are likely to be deliverable) there is limited information on the likely form of the BESS and substations.	The Applicant notes this comment. They provided additional information on the BESS and substations in the further (targeted) consultation, stating:

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				<p>1) they have opted for a single, central substation.</p> <p>2) the BESS has been moved further away from properties around the site and closer to the central farm buildings.</p>
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	We would welcome continued dialogue as the design of these structures is developed and our comments reiterate earlier advice that (where operational considerations allow) these structures should be housed within buildings which mimic the simple form and function of the existing agricultural buildings within and around the site.	The Applicant notes this comment. They will continue engaging with LCC on this issue.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	We are aware of submissions made to you by Paul Ostafiehyk which encourage you to pursue more innovative solutions combining renewable energy generation while continuing agricultural production via 'agrivoltaics'. There is reference to schemes in Germany and Colorado ('Jack's Solar Garden') which highlight an ability for the coexistence between agriculture and technology.	The growing of soft fruit under the panels was considered, but was not deemed suitable for the site.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	As we set out below in Chapter 16, we are concerned that at present the interplay between energy generation and agricultural productivity/BMV impacts has not been sufficiently developed beyond a high level reference to sheep grazing (reversion from arable to pastoral).	The land will still be classified as agricultural land. The area underneath and around the panels is proposed to be managed with sheep

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				grazing. The Applicant has also reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	In the context of our concerns regarding 'alternatives', the Norfolk appeal decision relating to BMV (see below) and mindful of the substantial size of the site we note the general approach advocated by Mr Ostafiehyk namely that Heckington could be an exemplar which incorporates a more innovative 'agrivoltaic' design approach focussed within the proposed panelled areas (as opposed to the indicative BNG land) and we welcome a separate discussion with you on this point.	The Applicant notes this comment. The growing of soft fruit under the panels was considered, but was not deemed suitable for the site.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	<u>Rochdale Envelope/Table 4.1</u> Needs to ensure that BMV implications are considered. Specific ALC testing proposed in BESS and greater potential impact on BMV envisaged so might not be appropriate to allow Rochdale Envelope re-siting of BESS onto more sensitive ALC land	The Applicant notes this comment.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	<u>Fig 3.2</u> Figure 3.2 (Working Indicative Site Layout) and Figure 4.1d (Proposed Battery Storage and New Infrastructure) identify significantly different sized areas for the battery storage area. This should be clarified to ensure consistency across all plans and layouts used to inform the assessments carried out as part of the ES (also see comments under 'Noise and Vibration' section). Figure 3.2 (Working Indicative Site	The Applicant notes this comment. Figure 3.2 was a working layout for information, 4.1d reflected the layout in the PEIR (and was therefore correct) at

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			Layout) and Figure 4.1e (Proposed Ecological Enhancements for Operational Energy Park) identify different sized areas for potential biodiversity net gain with one identifying this as 95.34ha and the other citing 112.15ha. This should be clarified for consistency reasons.	the time of writing. The layout has subsequently been updated for the ES (document reference 6.1.1).
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	<p><u>4.5.26 to 4.5.28</u>  Noted increase in numbers; how do the substation locations (132kv/400kv) align with the ALC grades and the consideration of alternatives (layout) mindful that impacts associated with the substations and associated hardstanding are elevated?</p>	The Indicative Layout for this site has a single 400kv substation located within the ESS area. The ESS has been located on Grade 3b land. A plan within the DAS shows this information.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	<p><u>4.5.33</u>  Is it possible to identify ‘other pieces of critical infrastructure’ relative to the new/retained hedgerows to consider impacts on bats? How will lighting operate; timer, PIR sensor? What is the overall approach to lighting relative to ILE guidance; NKDC would suggest that ILE Zone E1 should be adopted</p>	The Applicant notes this comment. They will identify these pieces of infrastructure in the ES. There will be no permanent lighting requirements as part of the operational development. Any lighting required will be limited to the necessary H&S

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				lighting around the ESS and substation for emergency maintenance.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	<p><u>Table 4.3</u> The dimensions and extent of ground coverage of any flood defence bund should be specified and whether retained soil (BMV) will be used to form the bund?</p>	The Applicant notes this comment. Minimal flood bunding is required on the site as all elements have been designed to sit above the maximum predicted flood levels. The exception to this is the transformer in the ESS which will have a small bund around it.
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	<p><u>4.8.1</u> Elsewhere the PEIR suggests different grazing levels for the energy park site and BNG area. This paragraph infers same grazing regime.</p>	The Applicant notes this comment. The BNG area has been removed from the Energy Park site. All grazing will take place within the Energy Park and will be grazed to the same density.



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 4, Proposed Development	North Kesteven District Council	1 September 2022	<p><u>4.8.2</u> Will Elm Grange School take over the future management and maintenance of the orchard in totality? What are the arrangements if this not agreed – Parish Council or alternative scheme of ongoing management by Ecotricity/a management company? How will this be funded and secured in perpetuity given that the orchard will remain beyond the 40-year lifespan of the scheme?</p> <p>As a general comment in relation to the onsite substations, BESS and customer switchgear buildings the PEIR notes that the dimensions of the various buildings are dependent of further assessment work and so, as allowed under the Rochdale Envelope Principle, cannot be stated in this PEIR but a worst-case assessment will be adopted for the ES. The PEIR notes potential building dimensions of approximately 80m x 40m x 10m and 135m x 90m x 15m respectively for the 132kv and 400kv S/S's. NKDC welcomes ongoing dialogue regarding the design, detailing, bulk, scale and overall massing of these structures and we would reiterate our earlier advice that designs could mimic the simple form and function of the existing agricultural buildings within the site. Other than confirming that these will be likely grey or galvanised steel clad no other information is available at this stage.</p> <p>we are aware of submissions made to you by Paul Ostafiehyk which encourage you to pursue more innovative solutions combining renewable energy</p>	<p>Management of the community orchard is outlined in the Outline Landscape and Ecological Management Plan (document reference 7.8).</p> <p>The Applicant notes this comment.</p> <p>The growing of soft fruit under the panels was considered but</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>generation while continuing agricultural production via 'agrivoltaics'. There is reference to schemes in Germany and Colorado ('Jack's Solar Garden') which highlight an ability for the coexistence between agriculture and technology. As we set out below in Chapter 16, we are concerned that at present the interplay between energy generation and agricultural productivity/BMV impacts has not been sufficiently developed beyond a high level reference to sheep grazing (reversion from arable to pastoral). In the context of our concerns regarding 'alternatives', the Norfolk appeal decision relating to BMV (see below) and mindful of the substantial size of the site we note the general approach advocated by Mr Ostafiehyk namely that Heckington could be an exemplar which incorporates a more innovative 'agrivoltaic' design approach focussed within the proposed panelled areas (as opposed to the indicative BNG land).</p> <p>The layout remains illustrative pending design freeze; not least in terms of the final location, layout, bulk, scale etc of the substations/BESS and as such now would be opportunity to consider this issue further. We would welcome a separate dialogue on design matters (without prejudice to our general concerns regarding BMV impacts) to explore whether and how more innovative approaches to agricultural/horticultural productivity alongside the operation of the solar park can be embedded into the scheme.</p>	<p>was not deemed suitable for the site. The land will still be classified as agricultural land. The area underneath and around the panels is proposed to be managed with sheep grazing. The Applicant has also reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p> <p>The Applicant notes this comment. They continued to engage with North Kesteven District Council on this issue ahead of the design freeze.</p> <p>The Applicant notes this comment. They</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>Finally we also consider that the landscape mitigation strategy is under-developed at this stage. Paragraph 6.8.25 notes that ‘existing hedgerows and lines of trees within the Energy Park would be protected and enhanced with gapping-up using appropriate species. New hedgerows would be established along the southern and western edges of the solar modules, and within the Energy Park. Further design options for mitigation measures, and species selection, are currently being considered’.</p> <p>We have previously identified and recommended that to help the site better assimilate into the landscape that there should be some elements of tree and copse planting at strategic locations to break/filter views; not least of the larger elements of infrastructure (e.g. the BESS) when travelling along the A17. Map regression suggests that the site historically had linear bands of copses running north/south. The PEIR suggests that soft landscaping would be restricted to new or bolstered hedge planting but which seems to be a missed opportunity in light of the size of the site and not least given the location and extent of buffer zones and BNG opportunity areas.</p>	<p>are continuing to develop their landscape mitigation strategy.</p> <p>The Applicant notes this comment. They continued to work with a team of environmental specialists to determine how best to incorporate soft landscaping into the site design.</p>
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Figure 3.2 (Working Indicative Site Layout) and Figure 4.1d (Proposed Battery Storage and New Infrastructure) identify significantly different sized areas for the battery storage area. This needs to be clarified to ensure consistency across all plans and layouts used to inform the assessments carried out as</li> </ul>	<p>The Applicant notes this comment. There is a single area on the Energy Park site for the ESS. This is a design alteration from the PEIR which</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			part of the ES (also see comments under 'Noise and Vibration' section).	had a series of locations on the Energy Park site.
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Figure 3.2 (Working Indicative Site Layout) and Figure 4.1e (Proposed Ecological Enhancements for Operational Energy Park) identify different sized areas for potential biodiversity net gain with one identifying this as 95.34ha and the other citing 112.15ha. This needs to be clarified to ensure consistency across all plans and layouts used to inform the assessments carried out as part of the ES (also see comments under 'Ecology and Ornithology' section).</li> </ul>	The Applicant notes this comment. The BNG area from the Energy Park site has been removed. The BNG areas are presented in the Ecology Chapter of the ES and the Outline Landscape and Ecology Management Plan (OLEMP, document reference 7.8)
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	LCC's appointed Landscape Consultants (AAH consultants) have also provided the following comments in relation to this specific chapter. A full copy of their comments is attached to this response should therefore also be read in conjunction with this response.	The Applicant notes this comment.
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Section 4.2, paragraph 4.2.1 and Table 4.1 cover flexibility within the DCO and plans. While we understand the need for flexibility to accommodate new and evolving technology, the location of taller and larger elements (e.g. the substations and battery storage) have greater visual effects than PV panels and as such we would expect the locations of these elements be indicated within the ES to allow for the</li> </ul>	The Applicant notes this comment. The LVIA has considered a maximum area and height for the ESS & substation. This area is shown on the photomontages

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			LVIA to accurately assess and viewpoints and/or visualisations to illustrate.	which are within the ES.
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Paragraphs 4.5.1 to 4.5.39 provide detailed information on the components of the development and Tables 4.2 and 4.3 of the PEIR usefully provide details of the design parameters used for the PEIR. However, we have concerns in regards to the larger and taller elements, such as the bunding (up to 6m), substation and Control Building Parameters as outlined in Table 4.3. The final location and layout of these elements will have likely greater visual effects in this flat, open rural landscape than PV panels. We would expect the approximate location and “worst case” extent (footprint) of these elements to be identified for the LVIA to allow for a better understanding of the potential landscape and visual effects, an updated ZTV based upon these parameters and an understanding of the likely requirement for additional viewpoint photographs to capture views of the taller/larger elements which will be much more visible and conspicuous.</li> </ul>	The Applicant notes this comment. The ES has been assessed against a series of maximum parameters of these features. Elevation plans (Figure 4.4-4.25) within the ES link to these maximum extents for the elements of the Proposed Development.
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Paragraphs 4.5.40 to 4.5.42 provide information on offsite cabling, the route of which is still being developed, and confirms that no above ground cabling is proposed off site. However we have concerns in regards to the visual and landscape impacts, as well as potential ecological impacts, where cables cross obstacles, such as watercourses or the train line, which we assume would be carried out by directional drilling to minimise effects, particularly at construction. This should be clearly stated and assessed as part of the</li> </ul>	The Applicant notes this comment. The construction works necessary for cabling installation will involve directional drilling. The locations of the possible drill points are identified in Chapter 4 of the

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			assessment and existing landscape and ecological assets in these locations should be protected and surveyed if appropriate to ensure effects are minimised.	ES. Existing assets will be protected if appropriate.
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• Paragraphs 4.5.43 to 4.5.45 provide information on the Bicker Fen Substation works. The ES should clearly state the proposed works in this location as they have likely landscape and visual effects, particularly if impacting existing trees, as referenced within paragraph 4.5.45. At this stage, limited viewpoints have been proposed in this location, and once works are understood, we would suggest consultation is carried out with AAH/LCC and the district councils to ascertain any additional viewpoint requirements to assess visual effects.</li>   <li>• Mitigation proposals are provided in Table 4.3, which identifies Biodiversity Net Gain Area and Community Orchard. While these areas are shown on illustrative layouts, having these included in the design parameters allows for them to be accurately captured as part of the scheme, and parameters plan clearly illustrating these areas would be recommended. Figures 4.1C , 4.1 D and 4.1E appear to be good examples of plans to submit as</li> </ul>	<p>The Applicant notes this comment. The ES gives details on the works required at Bicker Fen Substation in Chapter 4 (document reference 6.1.4). Viewpoints 9 and 15 are included in LVIA Figures (document reference 6.2.6). The Applicant continued to engage with LCC and their advisors at AAH about viewpoints locations.</p> <p>The Applicant notes this comment. The BNG area is no longer in the Energy Park site. The community orchard is and is shown within the design parameters.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			potential parameter plans to accompany the design parameters tables. This would allow for transparency and clarity of development areas, areas of taller/larger development and mitigation when reviewing the LVIA and allow for an understanding of how the development has been assessed.	
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Vegetation loss -the extent of any vegetation loss to facilitate construction or permanent site access points and highway widening works (as outlined in Table 4.3 and Appendix 14.1 of the PEIR) have not been identified. Vegetation loss is also identified in association with the works at the Bicker Fen Substation. It is likely any vegetation cut back in order to achieve sight lines and/or widening or to facilitate other works will open up views and remove valuable elements of the local landscape. We would therefore expect any vegetation works or loss to be clearly illustrated and included within any assessment, as this has the potential to remove existing valuable features (that make up the character area) and open up views into or across the site or the wider area. We would expect any proposed vegetation removal to be surveyed to BS:5837 Trees in Relation to Design, Demolition and Construction to Construction so it is clear what the arboricultural value is (to aid assessment) and subsequently is appropriately mitigated as part of the proposals.</li> </ul>	The Applicant notes this comment. Vegetation works are minimal and are captured in a dedicated Arboricultural Impact Assessment (document reference 6.3.6.3).
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Overhead/ground lines - Could the height of any above-ground cabling and associated poles proposed within the site be clarified as these will likely have</li> </ul>	The Applicant notes this comment. They provided additional information on this in

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			additional visual effects and would need to be considered within the LVIA?	the further (targeted) consultation, stating that they have removed the option for overhead lines across the solar park site.
Chapter 4, Proposed Development	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• If the plans and sections for the LVIA are still intended to be indicative, the LVIA needs to clearly state what layout, offsets and mitigation the assessment has been based upon, as different mitigation strategies will likely alter potential effects. Also, we would expect the layout to not just deliver green infrastructure to the minimum offsets provided on Figure 4.1 C and seek opportunities for positive contributions to the landscape of the site. We would recommend an Outline Landscape and/or Ecological Management Plan, or similar, be developed to provide a clear strategy to secure any mitigation and enhancement areas.</li> </ul>	The Applicant notes this comment. They will state what the assessment has been based on in the ES. An Outline Landscape and Ecological Management Plan is provided with the DCO (document reference 7.8).
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>• Section 4.2 covers the “Rochdale Envelope” or worst case approach to the assessment, and paragraph 4.2.1 and Table 4.1 cover flexibility within the DCO and plans. While we understand the need for flexibility to accommodate new and evolving technology, the location of taller and larger elements such as the substations and battery storage with have greater visual effects than PV panels, and as such we would expect the locations of these elements be indicated within the ES to allow for the LVIA to accurately assess and viewpoints and/or visualisations to illustrate.</li> </ul>	The Applicant notes this comment. The location of these elements has been included within the Works Plans and has been assessed as per the Rochdale Envelope. The central location of them is considered to reduce



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				the visual impact of the taller elements.
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraphs 4.5.1 to 4.5.39 provide detailed information on the components of the development and Tables 4.2 and 4.3 of the PEIR usefully provide details of the design parameters used for the PEIR. However, we have concerns in regards to the larger and taller elements, such as the bunding (up to 6m), Substation and Control Building Parameters as outlined in table 4.3. The final location and layout of these elements will have likely greater visual effects in this flat, open rural landscape than PV panels. We would expect the approximate location and “worst case” extent (footprint) of these elements to be identified for the LVIA to allow for a better understanding of the potential landscape and visual effects, an updated ZTV based upon these parameters and an understanding of the likely requirement for additional viewpoint photographs to capture views of the taller/larger elements which will be much more visible and conspicuous.</li> </ul>	The Applicant notes this comment. The maximum extents of all elements of the Proposed Development have been assessed within the ES. Elevation plans to show these items are included in Figures 4.4-4.26 of the ES (document reference: 6.2.4)
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraphs 4.5.40 to 4.5.42 provide information on offsite cabling, the route of which is still being developed, and confirms that no above ground cabling is proposed off site. However we have concerns in regards to the visual and landscape impacts, as well as potential ecological impacts, where cables cross obstacles, such as watercourses or the train line, which we assume would be carried out by directional drilling to minimise effects, particularly at construction. This should be clearly stated and assessed as part of the</li> </ul>	The Applicant notes this comment. The construction works necessary for cabling installation will involve directional drilling. Existing assets will be protected as appropriate. The ES

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			assessment and existing landscape and ecological assets in these locations should be protected and surveyed if appropriate to ensure effects are minimised.	has considered the locations of the proposed drill locations. These locations are shown in Chapter 4 of the ES.
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>• Paragraphs 4.5.43 to 4.5.45 provide information on the Bicker Fen Substation works. The ES should clearly state the proposed works in this location as they have likely landscape and visual effects, particularly if impacting existing trees, as referenced within paragraph 4.5.45. At this stage, limited viewpoints have been proposed in this location, and once works are understood, we would suggest consultation is carried out with AAH/LCC and the district councils to ascertain any additional viewpoint requirements to assess visual effects.</li> </ul>	The Applicant notes this comment. The ES will state the proposed works in this location. The Applicant will continue engaging with LCC about viewpoints.
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>• Mitigation proposals are provided in Table 4.3, which identifies Biodiversity Net Gain Area and Community Orchard. While these areas are shown on illustrative layouts, having these included in the design parameters allows for them to be accurately captured as part of the scheme, and parameters plan clearly illustrating these areas would be recommended. Figures 4.1C , 4.1 D and 4.1E appear to be good examples of plans to submit as potential parameter plans to accompany the design parameters tables. This would allow for transparency and clarity of development areas, areas of taller/larger development and mitigation when reviewing the LVIA</li> </ul>	The Applicant notes this comment. These areas will be included in the design parameters.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			and allow for an understanding of how the development has been assessed.	
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Regarding the community orchard: at this stage it is unclear why this has been included within the scheme or if consultation has been carried out with the community to include this element. While it would undoubtedly be a positive addition to the landscape, it is unclear what community would benefit, use or maintain the orchard being in a relatively remote location and likely accessed primarily by car. The adjacent Elm Grange School would undoubtedly benefit from this asset, however could an explanation and justification be provided, and are there other assets that may be more appropriate in this location?</li> </ul>	The Applicant notes this comment. They consulted on this element during the statutory consultation. It will be available for use by arrangement by local groups, wherever they are located. They will continue engaging with LCC on how the Project could benefit the local community.
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Regarding vegetation loss: <ul style="list-style-type: none"> <li>-The extent of any vegetation loss to facilitate construction access or the permanent site access points from the A17, outlined in Table 4.3, is not identified. While it is assumed that site access will be taken from existing agricultural tracks and field entrances to minimise effects, it is likely these may need vegetation cut back for sight lines and/or widening.</li> <li>-Any vegetation loss to facilitate any potential wider highways works (as illustrated on highways figures within Appendix 14.1 of the PEIR) for construction access is not identified. Paragraph 4.7.1, bullet 15 identifies widening of highways access points, which may result in vegetation removal, and bullet 16</li> </ul> </li> </ul>	The Applicant notes this comment. Vegetation works will be included within assessments.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>identifies vegetation removal at Bicker Fen Substation. This removal is likely to open up views and remove valuable elements of the local landscape.</p> <p>-We would expect any vegetation works or loss all to be clearly illustrated and included within any assessment, as this has the potential to remove existing valuable features (that make up the character area) and open up views into or across the site or the wider area. We would expect any proposed vegetation removal to be surveyed to BS:5837 Trees in Relation to Design, Demolition and Construction to Construction so it is clear what the arboricultural value is (to aid assessment) and subsequently is appropriately mitigated as part of the proposals.</p>	
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Regarding Overhead/ground lines: Could it be clarified the height of any above-ground cabling and associated poles are proposed within the site, as these will likely have additional visual effects and would need to be considered within the LVIA</li> </ul>	The Applicant notes this comment. They provided additional information on this in the further (targeted) consultation, stating that they have removed the option for overhead lines across the solar park site.
Chapter 4, Proposed Development	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>If the plans and sections for the LVIA are still intended to be indicative, the LVIA needs to clearly state what layout, offsets and mitigation the assessment has been based upon, as different mitigation strategies will likely alter potential effects. Also, we would expect the layout to not just deliver green infrastructure to the minimum</li> </ul>	The Applicant notes this comment. They will state what the assessment has been based on in the ES. An Outline Landscape

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			offsets provided on Figure 4.1 C and seek opportunities for positive contributions to the landscape of the site. We would recommend an Outline Landscape and/or Ecological Management Plan, or similar, be developed to provide a clear strategy to secure any mitigation and enhancement areas.	and Ecological Management Plan is provided with the DCO (document reference: 7.8).
Chapter 5, Planning policy	Environment Agency	16 August 2022	Under the Environmental Permitting (England and Wales) Regulations 2016, permission must be obtained from the Environment Agency for any proposed activities which will take place: <ul style="list-style-type: none"> <li>· in, over, under or within 8 metres of a main river (16 metres if tidal)</li> <li>· on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)</li> <li>· on or within 16 metres of a sea defence</li> <li>· within 16 metres of any main river, flood defence (including a remote defence) or culvert for quarrying or excavation</li> <li>· in a flood plain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if tidal) having the potential to divert flood flows to third parties, if planning permission has not already been granted for the works</li> </ul>	The Applicant notes this comment.
Chapter 5, Planning policy	Environment Agency	16 August 2022	Please note that the view expressed in this letter is a response to a pre-application enquiry only and does not represent our final view in relation to any future planning application made in relation to this site. We reserve the right to change our position in relation to any such application.	The Applicant notes this comment.
Chapter 5, Planning policy	Network Rail	30 August 2022	Please note that if the intention is to install cabling/equipment in support of the project through	The Applicant notes this comment. They

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>railway land as indicated, the developer will be need an easement from Network Rail and we would recommend that they engage with us early in the planning of their scheme in order to discuss and agree this element of the proposals.</p>	<p>will continue engaging with this consultee on this element of the proposals.</p>
<p>Chapter 5, Planning policy</p>	<p>Network Rail</p>	<p>30 August 2022</p>	<p>Network Rail will be seeking protection from the exercise of compulsory purchase powers over operational land either for permanent or temporary purposes. In addition, Network Rail will wish to agree protection for the railway during the course of the construction works and otherwise to protect our undertaking and land interests. Network Rail reserves the right to produce additional and further grounds of concern when further details of the application and its effect on Network Rail’s land are available. In addition, any rights for power or other lines under, over or alongside the railway line will require appropriate asset protection measures deemed necessary by Network Rail to protect the operational railway and stations. We have standard protective provisions which will need to be included in the DCO as a minimum therefore contact should be made to [REDACTED], email: [REDACTED]@networkrail.co.uk to obtain a copy of the relevant wording In addition a number of legal and commercial agreements will need to be entered into, for example, asset protection agreements, method statements, connection agreements, property agreements and all other relevant legal and commercial agreements. This list is not exhaustive and will need to be reviewed once more details of the scheme are discussed between the parties.</p>	<p>The Applicant notes this comment. They will include standard protective provisions in the DCO.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 5, Planning policy	Network Rail	30 August 2022	Network Rail also reserves the right to make additional comments once we have evaluated the proposals in more detail.	The Applicant notes this comment.
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	The chapter summarises the current and draft EN NPS's including draft EN 1, EN 3 and EN 5. However these sections do not acknowledge the transitional arrangements summarised in the draft EN1.	The Applicant notes this comment. They will update the chapter to acknowledge these transitional arrangements.
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	Paragraph 1.6.2 of draft EN1 notes that: 'applications for development consent will have been prepared, and may already be in examination, in reliance upon the 2011 suite of NPSs (or for nuclear development based on the position set out in the Written Ministerial Statement of 7 December 201710). The Secretary of State has decided that for any application accepted for examination before designation of the 2021 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS. The 2021 amendments will therefore have effect only in relation to those applications for development consent accepted for examination after the designation of those amendments'.	The Applicant notes this comment.
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	<u>5.2.1 to 5.2.12</u> These paragraphs variously summarise the current and draft EN NPS's including draft EN 1, EN 3 and EN 5. However these sections do not acknowledge the transitional arrangements summarised in the draft EN1.	The Applicant notes this comment. They will update the chapter to acknowledge these

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				transitional arrangements.
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	Paragraph 1.6.2 of draft EN1 notes that ‘applications for development consent will have been prepared, and may already be in examination, in reliance upon the 2011 suite of NPSs (or for nuclear development based on the position set out in the Written Ministerial Statement of 7 December 2017 <sup>10</sup> ). The Secretary of State has decided that for any application accepted for examination before designation of the 2021 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS. The 2021 amendments will therefore have effect only in relation to those applications for development consent accepted for examination after the designation of those amendments’.	The Applicant notes this comment.
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	Paragraph 1.6.3 of draft EN1 notes that ‘however, any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act and with regard to the specific circumstances of each development consent order application’.	The Applicant notes this comment.
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	Therefore, the planning policy section of the ES should be structured on the basis that it addresses both eventualities and ergo whether the DCO will be determined in accordance with either s104 or s105 of the 2008 PA. Whilst it is ultimately for the SofS to determine and apportion weight to the application and	Further detail is available in Statement of Need and Planning Statement (document reference 7.3).



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>relevance of ENs 1, and 3 and 5 if they are not adopted/designated at the point of acceptance for examination, the Council's position is that these are material and should carry a high degree of weight mindful of their stage of preparation and in the absence of any specific guidance on solar PV generation in the current EN-1 and EN-3 guidance. We would recommend that you seek ongoing updates from PINS to clarify the focus of the planning policy section of the ES however we would strongly encourage that both scenarios (s104 and s105) are addressed in the submission.</p>	
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	<p><u>5.2.35 and 5.2.36, 5.2.29</u>  The table references the emerging Central Lincolnshire Local Plan and the subsequent paragraph refers to SPDs. Please be aware that on 8th July 2022 the Local Plan Review was submitted to the Planning Inspectorate in order for it to commence its examination, and where dates are being explored in November and December 2022. All documents submitted, including the Proposed Submission Local Plan, supporting documents, consultation maps and representations received can be found in the Planning Policy Library at [REDACTED]  [REDACTED]</p> <p>Whilst the new Local Plan has been based on the 2017 Local Plan, with many policies and the overall ambitions of the plan remaining the same, there have been some significant policy changes/updates not least in relation to climate change. The plan is ambitious in trying to</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. They welcome the policy changes/updates in relation to climate</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			address climate change in a number of policies, including a requirement for net-zero-carbon homes and a framework for considering renewable energy infrastructure. Therefore subject to examination, there are a number of emerging policies that should be referred to in the underlying planning policy assessments in the ES, including but not limited to S5, S14, S16, S21, S47, S53, S57, S59, S60, S61, S66 and S67.	change. They believe it is important and needs fighting now. It is their mission to give people an alternative to fossil fuels – green energy. They are building new energy projects (including the Project) to that end. The Applicant plans to refer to a range of sections in the underlying planning policy assessments.
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	In terms of adopted guidance documents as noted below under the respective sub-headings, whilst the 2007 NKDC LCA has been referenced in relation to LVIA the adopted Heckington Conservation Area appraisal is not referenced in relation to Cultural Heritage. The applicant may also wish to reference the adopted NKDC Climate Emergency Strategy and Action Plan which can be accessed at [REDACTED]	The Applicant notes this comment.
Chapter 5, Planning policy	North Kesteven District Council	1 September 2022	In the context of reference to the NPPF at paragraph 5.2.29, the applicant may also wish to reference the National Design Guide and an analysis of how the design, layout and respective components of the scheme correspond to the 10 characteristics of good	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			design; including in the context of assessing alternatives.	
Chapter 6, Landscape and visual	South Kesteven District Council	12 July 2022	The site is sufficiently separated and screened from South Kesteven such that there would be no landscape and visual impacts of concern from the Energy Park aspect of the proposal. Further, the large area identified to the south of the site for potential underground cabling is unlikely to result in any significant landscape and visual impacts.	The Applicant notes this comment.
Chapter 6, Landscape and visual	Historic England	20 July 2022	Vegetation planting can have an impact on the setting of heritage assets so this should be included in any assessment.	The Applicant's assessments and final site layout will cover a range of factors, including proposed planting.
Chapter 6, Landscape and visual	Lincolnshire Police	20 July 2022	<p>Land selected should aim to avoid affecting the visual aspect of landscapes, maintain the natural beauty and should be predominantly flat, well screened by hedges, tree lines, etc. and not cause undue impact to nearby domestic properties or roads. (BRE. Planning guidance for the large-scale ground mounted solar PV systems)</p> <p>I have attached a copy of national guidance which reinforces this principle and would recommend that the boundary fence is to a minimum of LPS 1175 level 3 and to a height of 2.4 metres or to the current UK Government standard, SEAP (Security Equipment Approval Panel) class 1-3.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			The use of 2.4 metre welded mesh fencing (in green) would be the most unobtrusive method of providing a secure perimeter border.	
Chapter 6, Landscape and visual	National Grid Electricity Transmission	25 August 2022	<p>The following points should be taken into consideration.</p> <ul style="list-style-type: none"> <li>▪ If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.</li> </ul>	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<p>The LVIA and associated appendices and figures were prepared in advance of the suggested inclusion of additional VPs jointly by NKDC, Boston Borough Council and AAH Planning (on behalf of Lincolnshire County Council). We understand that these are to be incorporated into the final ES. We note and agree with the conclusion that significant (adverse) effects are predicted from 9 viewpoints.</p> <p>The ES should map where the central and southern parts of Sidebar Lane are and by reference to mapping the approximate parts of Sidebar Lane/the 81395 where significant adverse effects are likely to occur and conversely those parts that transition away from significant adverse effects.</p>	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	We note that AAH Planning will provide a more detailed commentary on behalf of LCC however from review of their initial draft we would support their observations and requests for additional information/clarity.	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<p><u>6.3.9</u> The PEIR identifies the extent of the Study Area of the development of up to 3km at paragraph 6.3.9, which defines the spatial scope of the area to be addressed, however the ZTV and PEIR (paragraph 6.3.6 and 6.3.7) does identify potential visibility beyond 3km. The LVIA Chapter should therefore include a clear statement, similar to that provided within paragraphs 6.3.6 to 6.3.9, on the justification for the extent of the Study Area.</p>	The Applicant notes this comment. The ES includes justification for the extent of the Study Area.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<p><u>6.3.15</u> It is noted that the LVIA chapter and associated appendices and figures were prepared in advance of the suggested inclusion of additional VPs. We understand that these are to be incorporated into the final ES. As such we do not wholly agree with the PEIR's statement that 'representative and illustrative viewpoints have been agreed with Lincolnshire County Council and North Kesteven District Council through the Scoping Report submitted to the Planning Inspectorate'.</p>	The Applicant notes this comment. They have continued to engage with North Kesteven District Council on this issue.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<p><u>6.3.24</u> This paragraph identifies "overhead electricity cables on 30m high poles within the Energy Park". The extent and location of these needs clarifying as part of the ES to allow for the LVIA to consider these within the assessment.</p>	The Applicant notes this comment. They provided additional information on this in the further (targeted) consultation, stating that they have removed the option for overhead lines

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				across the solar park site.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.3.25</u> The ES should identify buildings and infrastructure across the energy park site that are intended to be lit, whether these are adjacent to existing or proposed hedgerows, technical details of lux, sky glare/glow, spillage, any cowling to used, ILE Environmental Zone standards to be applied (NKDC suggests Zone E1) and measures to control the operation of external lighting	The Applicant notes this comment. The ES will identify which buildings and infrastructure are intended to be lit.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.3.57</u> The policy section could be expanded to reference NPPF paragraph 131 regarding the value of retained trees	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.3.64</u> This section refers to CLLP policies LP17 and LP19 but also needs to reference CLLP policies LP26 and LP55. The chapter should also refer to (and discuss overall compliance with) emerging CLLP submission draft design policies	The Applicant notes this comment. They have updated this section to reference CLLP policies LP36 and LP55.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.3.65</u> There could be cross reference here to CLLP Biodiversity Opportunity Mapping Study objectives. As set out above under the sub-heading of 'alternatives' the ES should consider and evidence more broadly the interplay between on-site BMV, BNG and the disposition of buildings and infrastructure in the consideration of alternative layouts	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.5.9</u>	

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			It might be useful to identify the individual or clusters of dwellings where different conclusions are drawn and briefly explain why they vary	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.5.12</u> We agree with the overall assessment in terms of effects for motorists from the A17 however it might be helpful to provide an annotated plan showing the parts of the A17 corridor where site views start to appear and change	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.5.22</u> It might be helpful to estimate the overall area of the NKDC Fenland LCA sub-area (by proportion of overall LCA area) which will be subject to significant adverse effects in the same way that the ES proposes to set out proportions/percentages of change or loss in relation to BMV ALC impacts	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.5.25</u> If there are localised variations in terms of estimated effects then it would be helpful to identify these through either individual properties or clusters.	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.5.27</u> The ES should map where the central and southern parts of Sidebar Lane are and by reference to mapping the approximate parts of Sidebar Lane/the B1395 where significant adverse effects are likely to occur and conversely those parts that transition away from significant adverse effects	The Applicant notes this comment. The ES has assessed the effects for users of Sidebar Lane/ the B1393.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.6.3</u> There is suggestion elsewhere in the PEIR that there might be some loss of the edge of woodland blocks to accommodate access works. This should be clarified. In	The Applicant notes this comment. There will be no loss to

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			addition there is only limited reference as to how the BNG areas' location assists with mitigation by providing undeveloped buffer blocks along the B1395 Sidebar Lane/SW corner of the site.	woodland blocks as part of this application. The BNG area is no longer part of the application.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.6.4</u> It would be helpful if the ES expands with discussion on the existing/natural or proposed screening of the other elements i.e. the 132kv substations etc and the degree to which screening can/cannot be provided by way of partial mitigation from the respective VPs. If woodland block co-location does not alter the overall significance of impact from a specific VP then better that the ES acknowledges that alternative siting or layouts of the substation infrastructure does not/cannot reasonably alter overall findings.	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.7.4 (table), 6.7.7, Fig 6.5 and 6.6</u> The table of cumulative schemes doesn't include the proposed Temple Oaks NSIP solar farm near Folkingham which post-dated EIA Scoping. However it is expected that there will be no cumulative LVIA impacts given the degree of separation involved.	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>6.8.28</u> As above it might be helpful to estimate the overall area of the NKDC Fenland LCA sub-area (by proportion of overall LCA area) which will be subject to cumulative significant adverse effects in the same way that the ES proposes to set out proportions/percentages of change or loss in relation to BMV ALC impacts	The Applicant notes this comment.
Chapter 6, Landscape and visual	North Kesteven District Council	1 September 2022	<u>VPs 1-4, 6 and 8</u>	



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>We note and agree that VPs 1-4, 6 and 8 are set within the ‘significant adverse’ category; although VP8 is set further away from the energy park boundary beyond the eastern edge with intervening field hedge boundaries along Head Dyke etc providing some filtering.</p>	<p>The Applicant notes this comment.</p>
<p>Chapter 6, Landscape and visual</p>	<p>North Kesteven District Council</p>	<p>1 September 2022</p>	<p><u>General comments</u>  We note that the PEIR chapter and the associated Appendix documents do not contain all post-development photomontages and therefore our comments are restricted to the information provided to date. As outlined within Chapters 3 and 4 of the PEIR, the development proposals are still being developed and finalised. This includes the type of panel and location and design of taller/larger elements such as substations and battery storage. While it is understood that some aspects of the scheme are unlikely to be detailed until the tendering has been completed, we would expect a reasonable level of design fix for the final ES which would clearly set out the parameters of the development, such as heights and locations of elements that have been used in the assessment, which if there are still some outstanding design and layout elements to be finalised should be based on a “worst case” scenario to ensure any effects are not underplayed. This is particularly important for larger and taller elements such as sub-stations or battery storage.</p> <p>We also consider that the landscape mitigation strategy is under-developed at this stage. Paragraph 6.8.25</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>notes that ‘existing hedgerows and lines of trees within the Energy Park would be protected and enhanced with gapping-up using appropriate species. New hedgerows would be established along the southern and western edges of the solar modules, and within the Energy Park. Further design options for mitigation measures, and species selection, are currently being considered’.</p> <p>We have previously identified and recommended that to help the site better assimilate into the landscape that there should be some elements of tree and copse planting at strategic locations to break/filter views; not least of the larger elements of infrastructure (e.g. the BESS) when travelling along the A17. Map regression suggests that the site historically had linear bands of copses running north/south. The PEIR suggests that soft landscaping would be restricted to new or bolstered hedge planting but which seems to be a missed opportunity in light of the size of the site and not least given the location and extent of buffer zones and BNG opportunity areas.</p>	<p>landscape mitigation strategy can be seen in the OLEMP (Document reference 7.8)</p> <p>The Applicant notes this comment. The outline Landscape Strategy can be seen in the OLEMP (document ref 7.8)</p>
Chapter 6, Landscape and visual	Natural England	1 September 2022	The proposed development is not located within, or within the setting, of any nationally designated landscapes. As a result, Natural England have no specific comments to make on landscape and visual impacts.	The Applicant notes this comment.
Chapter 6, Landscape and visual	Natural England	1 September 2022	Natural England welcome the intention to produce a Landscape and Visual Impact Assessment (LVIA) which will be included in the Environment Statement (ES). We also welcome that the LVIA will be undertaken with	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			regard to Natural England’s approach to Landscape Character Assessment (2014).	
Chapter 6, Landscape and visual	Natural England	1 September 2022	Natural England welcome the proposed additional mitigation and enhancements set out in paragraphs 6.6.5 to 6.6.7.	The Applicant notes this comment.
Chapter 6, Landscape and visual	Lincolnshire County Council	6 September 2022	<p>AAH Consultants has reviewed the PEIR and the following comments are offered on behalf of LCC which take into account previous AAH comments (Refer to Heckington Fen AAH TM01 and AAH TM02), as well as meetings held with Pegasus and any subsequent meeting minutes.</p> <p>The comments provided are intended to assist in guiding the next (final) stage of the process development, refinement of the content of the LVIA chapter and the overall development proposals. It is not a review of any of the preliminary findings or initial assessments.</p> <p>The following only summarises the comments provided by AAH and a full copy of their response is attached to this response. You are therefore advised to refer to that document for full details and comments on the PEIR.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. They have had regard to the full response provided by AAH Consultants (within this appendix).</p>
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	Overall the scope of the LVIA is generally aligned with the scoping report and scoping opinion, as well as other AAH comments (AAH TM01 and AAH TM02) and meetings held with Pegasus.	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<p>However, Paragraph 6.3.15 of the PEIR states that “Representative and illustrative viewpoints have been agreed with Lincolnshire County Council and North Kesteven District Council through the Scoping Report submitted to the Planning Inspectorate”. This is not correct, and as part of the scoping report it was requested that further consultation be carried out with the relevant councils in regards to the viewpoint locations and visualisations. Subsequently, AAH/LCC issued AAH TM02, that provided general comments on the landscape and visual aspects of the scheme as well as comments on proposed viewpoints, which included recommendations for additional views. These have not been incorporated into the PEIR, or shown on Figures 6.3a, 6.3b, and 6.3c at this stage. Therefore we request that further consultation is carried out between Pegasus and AAH/LCC and other relevant consultees, in regards to agreeing the viewpoints and visualisations.</p>	<p>The Applicant notes this comment. They have continue engaging with LCC on this issue to agree viewpoint locations.</p>
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<p>As outlined within Chapters 3 and 4 of the PEIR, the development proposals are still being developed and finalised. This includes the type of panel and location and design of taller/larger elements such as substations and battery storage. While it is understood that some aspects of the scheme are unlikely to be detailed until the tendering stage has been completed, we would expect a reasonable level of design fix for the final ES which would clearly set out the parameters of the development, such as heights and locations of elements that have been used in the assessment, which if there are still some outstanding design and layout elements to be finalised would be based on a “worst</p>	<p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			case” scenario to ensure any effects are not underplayed. This is particularly important for larger and taller elements such as sub stations or battery storage.	
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	As mentioned within paragraph 6.3.15 of the PEIR, it is requested that further landscape and visual consultation is carried out between AAH/LCC and District Authority landscape specialists and the developer team (Pegasus) following the conclusion of this second formal consultation phase. This would likely cover the PEIR comments, AAH TM02, as well as development proposals and the mitigation scheme, and location of any larger structures or buildings such as the substations and development at Bicker Fen Substation, extent of vegetation loss for highways works, and also subsequent knock-on effects such as any requirement for additional viewpoints or AVRs.	The Applicant notes this comment. They have continued to engage with these specialists on this issue.
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	In regards to the Landscape and Visual chapter (Chapter 6 of the PEIR): <ul style="list-style-type: none"> <li>• The visual receptors and viewpoints were previously discussed with AAH, and subsequently AAH issued AAH TM02 via email to Pegasus with initial comments on receptors and viewpoints, recommending additional viewpoints or amendments to those proposed, and suggested a follow up workshop. It is therefore requested that further landscape and visual consultation is carried out between AAH/LCC and District Authority landscape specialists and the developer team (Pegasus) following the conclusion of this second formal consultation phase.</li> </ul>	The Applicant notes this comment. They will continue to engage with these specialists on this issue.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>• For the LVIA, the elements within the Proposed Development, detailed in paragraph 6.2.5, should all reference design parameters, clearly stating extent (location and area) and size (including maximum height) of each element that makes up the development.</li> </ul>	The Applicant notes this comment. The LVIA has been completed against a series of maximum parameters which link to the Indicative Design of the Energy Park and the extension to Bicker Fen substation. These parameters are shown on the elevation plans within the ES (Figure 4.4-4.26 document ref: 6.4.4)
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>• The PEIR identifies the extent of the Study Area of the development of up to 3km at paragraph 6.3.9, which defines the spatial scope of the area to be addressed. The ZTV (Figures 6.3) shows a study area of 5km and along with PEIR (paragraph 6.3.6 and 6.3.7) does identify potential visibility beyond 3km, and from AAH site visits potential visibility of the site and development were identified beyond 3km. The LVIA Chapter should therefore include a clear statement, similar to that provided within paragraphs 6.3.6 to 6.3.9, on the study area (3km or 5km), justification for the extent of the Study Area and figures should also clearly illustrate this extent.</li> </ul>	The Applicant notes this comment. The ES will include justification for the extent of the Study Area.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraph 6.3.10 provides an overview of the proposed development at Bicker Fen Substation, and we would expect the LVIA to fully assess these landscape and visual effects and include viewpoints and visualisations as appropriate.</li> </ul>	The Applicant notes this comment.
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraph 6.3.12 states that landscape effects would be limited to the area occupied by the Proposed Development. This may not always be the case, and would anticipate there may be potential effects in the area immediately surrounding the site where the landscape character may indirectly change, for example, currently being an open rural landscape, to one that contains development and artificial landform (bunds) that screen views and effect the perception of openness and “big skies”.</li> </ul>	The Applicant notes this comment.
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraph 6.3.15 states that “Representative and illustrative viewpoints have been agreed with Lincolnshire County Council and North Kesteven District Council through the Scoping Report submitted to the Planning Inspectorate”. As stated previously, this is not correct, and as part of the scoping report it was requested that further consultation be carried out with the relevant consultees in regards to the viewpoint locations and visualisations. Subsequently, AAH/LCC issued AAH TM02, that provided general comments on the landscape and visual aspects of the scheme as well as comments on proposed viewpoints, which included recommendations for additional views. Paragraph 6.3.67 also identifies (indirectly) comments and initial discussions held between AAH/LCC and Pegasus. The AAH comments have not been incorporated into the</li> </ul>	The Applicant notes this comment. They have continued to engage with LCC on this issue.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			PEIR, or shown on Figures 6.3a, 6.3b, and 6.3c at this stage. Therefore we request that consultation is carried out between Pegasus and AAH/LCC in regards to agreeing the viewpoints and visualisations.	
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraph 6.3.24 identifies: “overhead electricity cables on 30m high poles within the Energy Park”. The extent and location of these needs clarifying as part of the ES to allow for the LVIA to consider these within the assessment.</li> </ul>	The Applicant notes this comment. They provided additional information on this in the further (targeted) consultation, stating that they have removed the option for overhead lines across the solar park site.
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>In regards to lighting (paragraph 6.3.25), the ES should clearly state what the proposed lighting scheme will comprise, including technical information such as lux levels and how it would be controlled. We would expect the LVIA to provide a visual assessment of this lighting.</li> </ul>	The Applicant notes this comment. The ES will state what the proposed lighting scheme will comprise.
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>In regards to Assessment of Significance (paragraphs 6.3.33 to 6.3.39), it is assumed the PEIR is stating that only effects of a Major level would be considered as Significant. Therefore, moderate or moderate to major landscape and visual effects may not be considered significant. We disagree with this, which is a variation from typical assessments that may class effects moderate (and above) as significant: no justification in the methodology is provided for this and could lead the</li> </ul>	The Applicant notes this comment. The ES will clarify and justify its assumptions.



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			assessment as being deemed as underplaying the identification of significant effects.	
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraph 6.3.72, bullet 7, states: “The assessed Proposed Development is based on application drawings that accompany this PEIR and is assessed on the assumption that the Proposed Development is delivered in line with these drawings and associated timescales.”. This statement causes some confusion as layouts are currently labelled indicative, which we assume is commensurate with the preliminary nature of the PEIR. The submission and LVIA should clearly detail the scheme that the submission will be based upon: indicative layouts or parameter plans.</li> </ul>	The Applicant notes this comment. The ES will clarify this point and detail what the submission is based upon.
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>Paragraph 6.4.5 identifies PROW Heck/15/1 running along the northern boundary of the site, and also its termination at Head Dyke. This correlates with the online LCC PROW mapping, and while does not connect into a wider network to the east, is a relatively long section (more than 1.6 miles) of PROW that should be considered in the assessment.</li> </ul>	The Applicant notes this comment. They will consider the wider network to the east.
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<p><u>Identification of receptors:</u></p> <ul style="list-style-type: none"> <li>The PEIR identifies a range of landscape and visual receptors within the Study Area.</li> <li>The correct National and Local Landscape Character Areas (LCA) have been referred to within the PEIR and cover a range of scales, and there is potential to scope out character areas that would not be affected by the development or those that are at a large scale and would provide context only, such as NCAs.</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<ul style="list-style-type: none"> <li>• Potential landscape receptors at varying scales are identified for consideration in the LVIA within paragraphs 6.4.14 6.4.19. We would also expect a finer-grained site-level (and immediate context) assessment and identification of individual elements or features of the site and landscape/landscape character areas to form the baseline of the LVIA.</li>   <li>• It would be useful to take into account the information collated as part of the Historic landscape characterisation project: The Historic Character of The County of Lincolnshire (September 2011), to ensure that the development is sensitive to the historic landscape. The project documents and the mapping can be accessed here: Historic Landscape Characterisation – Lincolnshire County Council</li>   <li>• Nineteen viewpoints have been identified (paragraphs 6.4.34 and Table 6.3) within the PEIR, which are located on Figures 6.3a, 6.3b, and 6.3c. The visual receptors and viewpoints were previously discussed with AAH, and subsequently AAH issued AAH TM02 via email with initial comments on receptors and viewpoints, recommending additional viewpoints or amendments to those proposed. At this stage, this consultation or AAH TM01 has not been incorporated into the PEIR, and we would request further discussions and meetings are held between AAH and other stakeholders with Pegasus.</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. They will continue working with a team of specialists to ensure the development is sensitive to the historic landscape.</p> <p>The Applicant notes this comment. They will continue engaging with AAH on this issue.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>Also, as stated and noted in previous correspondence, at this stage, there are not fixed details on the location and appearance/extent of taller/larger elements that form part of the development, which would likely have visual impacts that may require additional viewpoints beyond those initially identified. Additional viewpoints of development at the Bicker Fen Substation (currently on viewpoint 15 would likely cover this) may also be required once final design or parameters have been developed.</p> <ul style="list-style-type: none"> <li>• For the PEIR, three viewpoints have been selected by Pegasus to be developed as photomontages (VPs 6, 8, 18). At this stage, these have not been discussed or agreed with AAH/LCC, or as we understand any other stakeholders or appropriate consultees. We request consultation is held with AAH/LCC and other stakeholders in regards to agreeing the views taken forward as photomontages, the AVR Level that would be most appropriate to illustrate the proposals, which we would assume would be Level 2 or Level 3, however photo wire (Level 0 or Level 1) may be more appropriate in some long distance or fully screened views and what Type (would likely be Type 3 or 4), to Landscape Institute TGN 06/19 Visual Representation of Development Proposals.</li> <li>• Paragraph 6.4.32 identifies groups of visual receptors: -The extent of views (approximate start point and endpoint) that are available to receptors traveling along linear elements (such as roads or PROW) would</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The assessment will consider this within</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>be useful, e.g. along a 200m stretch of the road looking north, or: from receptors traveling south along high points of the PROW.</p> <p>-In regards to the receptor groups: Road Users, while many of the surrounding lanes and tracks within the study area are rural and remote in character and primarily used for motor vehicles and farm access, they are also used by dog walkers, horse riders and leisure cyclists, and subsequently the assessment should consider this within the baseline and methodology. The local value of these networks should be considered beyond being simply vehicle “road networks”, they also provide suitable connections for walkers improving the connectivity of the wider recreational footpath/PROW network.</p>	the baseline and methodology.
Chapter 6, Landscape and visual	Lincolnshire County Council (AAH Consultants)	6 September 2022	<ul style="list-style-type: none"> <li>• The assessment of Landscape Character Effects (from paragraph 6.5.2) gives an initial judgement on the level of effect; however we would urge caution in regard landscape character areas, which often are assessed as having limited magnitudes of change as the change would be small scale and/or extent (development site) would only affect a small percentage of the overall, much larger, character area. Using this approach, any development in a large character area will always be deemed relatively “small”. We would encourage the LVIA assess what the change would be in that part of the character area and what identified key elements identified within the character areas are impacted, and how development change would affect those elements or characteristics.</li> </ul>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 7, Residential visual amenity	Boston Borough Council	25 August 2022	cumulative effects of the cabling works of several other local schemes proposed at Temple Oaks, Folkingham and Bicker Solar Farm should be taken into account as these schemes also propose cabling works to connect to National Grid at Bicker. The potential for cumulative impacts on residential amenity, the environment and heritage assets should be taken into account, along with any proposed mitigation in relation to traffic movements, dust and noise impacts, especially during construction phases.	The Applicant notes this comment. They will account for these cumulative effects where required.
Chapter 7, Residential visual amenity	North Kesteven District Council	1 September 2022	<p>We agree with the overall assessment that ID1, 3, 5 and 8 are expected to experience significant effects. However there is limited reference as to how other clusters not responding to your pre-application approaches for site assessments are to be considered; the focus is on the ID properties listed in the PEIR but with no 'surrogate' applied to the other address points/groups.</p> <p>The ES should therefore identify all address points or clusters by individual reference and then carry across as necessary any 'surrogate' findings from the most appropriate ID property for which information and photographs have been obtained. As per previous discussions you've also acknowledged that 'The Bungalow' B1395 Sidebar Lane was missed from the property lists but will be captured in the ES.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The ES will identify all address points/clusters and carry across 'surrogates' as necessary. It will also capture 'The Bungalow'.</p>
Chapter 7, Residential visual amenity	North Kesteven District Council	1 September 2022	<u>7.3.27/ID properties with expected significant effects</u>	

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>ID1, 3, 5 and 8 are expected to experience significant effects but not to an overbearing/unacceptable degree. However there is limited reference as to how other clusters not responding to the pre-application approaches for site assessments are to be considered; the focus is on the ID properties listed in the PEIR but with no 'surrogate' applied to the other address points/groups. The relevant chapter of the ES should therefore identify all address points or clusters by individual reference and then carry across as necessary any 'surrogate' findings from the most appropriate ID property for which information and photographs have been obtained.</p> <p>We request that the RVAA should show measured distances between the ID property and the closest element of infrastructure, the relative orientation, and as above either numbered individual or clustered properties if a proxy is used, along with consideration of issues such as seasonal leaf loss and how this impacts on overall significance levels.</p>	<p>The Applicant notes this comment. The ES will identify all address points/clusters and carry across 'surrogates' as necessary.</p> <p>The Applicant notes this comment.</p>
Chapter 7, Residential visual amenity	North Kesteven District Council	1 September 2022	<p><u>Missing baseline property</u> Finally the RVAA misses a property in the baseline assessment – 'The Bungalow' B1395 Sidebar Lane (subject to planning application reference 00/0510/FUL)</p>	The Applicant notes this comment. The ES will capture 'The Bungalow'.
Chapter 7, Residential visual amenity	Lincolnshire County Council	6 September 2022	No comments on this chapter, however would suggest reference is made in the RVAA to considering residential views along the cable route and works associated with the Bicker Fen Substation.	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 7, Residential visual amenity	Lincolnshire County Council (AAH Consultants)	6 September 2022	No comments on this chapter, however would suggest reference is made in the RVAA to considering residential views along the cable route and works associated with the Bicker Fen Substation.	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	8 July 2022	RE: mink. I've been told IDB black sluice do their own trapping for their catchment so this may be a suitable avenue to pursue for the mitigation for the site.	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Lincolnshire Police	20 July 2022	<p>The development will need to have regard in both its design layout, and future maintenance plans for the retention of growth of vegetation on these important boundaries, including the opportunity for trees within the boundaries to grow on to maturity.</p> <p>The use of natural vegetation as a feature should not compromise the benefit of clear and unobstructed natural and formal (CCTV System) surveillance.</p> <p>Existing hedges and established vegetation, including mature trees, should be retained wherever possible.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	I welcome confirmation that further survey data will be presented later for certain species e.g. great crested newt and flora. In the absence of this data, parts of the assessment go beyond what is reasonable and precautionary with reference to the current evidence base e.g. the conclusion that the loss of arable farmland is beneficial when not all of the survey data is available to evidence this. However, I do not think it necessary to comment further on this specific point given that work is ongoing. It is clearly stated that the impact assessment will be updated later to take account of all relevant data.	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	Section 8.3 (Study Area) does not currently define the study area or the potential zone of influence. In clarifying this later, a distinction can be made between what is appropriate and precautionary for data gathering to define the baseline, and what is relevant to the impact assessment. Clarification of the likely worst case zone of influence (which is likely to be the extent of worst case dispersion of emissions to air and noise and visual disturbance during construction) will support review and agreement of the subsequent impact assessment.	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	Paragraph 8.3.7 states that a Preliminary Ecological Appraisal (PEA) was completed. This has not been provided with the PEIR, but I think that it is needed to provide clarity on the approach to survey and assessment (including the clarifications requested during previous phases of consultation). There is no one location at present where the field and desk study data are considered together to transparently define the ecological features relevant to the chapter. It may be that Appendix 8.1 is intended to meet this purpose and, if so, further comment is provided on this below.	The Applicant notes this comment. They will provide this document with the DCO (document reference 6.3.8.1).
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	Paragraph 8.3.10 refers to the approach being compliant with standard professional good practice. However, the good practice considered is generally not referenced within the reports (e.g. within the protected species method statements in Appendix 8.1). Details should be provided of the species and habitat specific good practice followed, as well as consideration of the over-arching requirements set out in the Chartered Institute of Ecology and Environment Management	The Applicant notes this comment. The ES will reference the good practice they have complied with.



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			Guidelines for PEA and the underpinning British Standard BS42020 Biodiversity – A code of practice for planning and development.	
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	<p>While reference has been made to standard guidance for Ecological Impact Assessment (EclA) the approach set out in the method statement has not been fully applied later in the chapter. The ecological features identified in the baseline have not obviously been assigned a geographic value, and the standard terminology for impacts and effects has generally not been utilised. In many cases, the nature of the potential impacts, and their extent, magnitude, duration and reversibility (permanence) of these impacts is not sufficiently described or quantified.</p> <p>The assessment is intended to be of the development as designed, so reasonably ‘mitigation by design’ is part of the scheme. For example, there is no pathway for impact on the South Forty Foot Drain as the construction approach involves directional drilling to avoid this site. Clarity would be assisted by taking account of such committed measures sooner.</p> <p>A future baseline section has not been provided (although this may be the intention of the section impact, referring to climate change). The future baseline is the baseline conditions likely to be present at the time of construction and operation, so this section should clarify how the current baseline conditions may have changed by that time.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The construction works necessary for cabling installation will involve directional drilling.</p> <p>The Applicant notes this comment. The ES will provide a baseline.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>A clear assessment is not currently provided of the potential impacts and effects of the qualifying interest features of the SPA. This is because of both the layout of the designations section, and the splitting of the relevant issues between this section and the bird section. The assessment is also not clear if there is a meaningful impact on the relevant qualifying feature (pink footed goose) that needs mitigation. If mitigation is needed, then this should be relevant to the source of impact e.g. sensitive timing to prevent disturbance leading to displacement of geese from foraging habitat. I do not think that denying geese access to foraging habitat so that they forage beyond the zone of influence is appropriate or proportionate mitigation for a disturbance impact that has the same effect. Provision of alternate foraging areas would be more appropriate if this is necessary and securable.</p> <p>Relating to the above point but of wider relevance, the impact assessment sections on designations and birds needs to be split out so that specific impacts on specific features (individual sites and species) are transparently assessed. The breeding bird sections in particular are hard to follow. Relevant impacts need to be more clearly identified, quantified and assessed. Clarity is also needed on whether mitigation is needed and if it is feasible/securable. The bird assessment could group the bird species based on their relative sensitivities/habitat affinities. Not all of the bird species are of comparable nature conservation importance, and they will vary in their sensitivity to the proposed</p>	<p>The Applicant notes this comment. The ES will clarify the impact on pink footed geese and the Applicant's intentions regarding mitigation.</p> <p>The Applicant notes this comment. The ES will split out these sections and provide clarity regarding mitigation.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>large scale shift from arable farmland to grassland that will arise from this development. For some species the impact may be neutral or beneficial (dependent on grassland management regimes) while other species may be lost from the site.</p> <p>The chapter does not include a precautionary assessment of great crested newt. This is not of specific concern given that the application will confirm the presence/absence of this species later.</p>	<p>The Applicant notes this comment.</p>
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	<p><u>Appendix 8.1 Extended Phase 1 Habitat Survey Report</u> This report does not meet minimum requirements for a habitat survey report and is not adequate as an evidence base to support the Biodiversity Net Gain (BNG) assessment. Currently, the level of information provided does not afford transparency in what was done and found, and the evidence presented is not sufficient to permit third party verification of the conclusions presented.</p> <p>Much of the report focusses on screening the potential for protected species to occur, rather than meeting the core purpose of a phase 1 habitat survey which is to characterise the baseline habitat conditions and the intrinsic biodiversity value of these habitats (on their own merits rather than as vessels for protected animal species). Insufficient description and botanical information is provided for most habitats, including the grasslands.</p>	<p>The Applicant notes this comment. The ES will provide additional information around what was done and found, as well as extra evidence.</p> <p>The Applicant notes this comment. The ES will provide additional description and botanical information (document reference 6.3.8.6).</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>The phase 1 habitat map and descriptions do not appear to address all habitats present. For, example the screen shot below (Plate 1) shows a corridor of grassland and field boundaries with features resembling hedgerows. These are not described in the report (e.g. through provision of target notes and photographs), and the latter have been mapped as scattered scrub. It might be that these features are retained but, as they are within the red line, they have a potential bearing on the BNG assessment as well as the understanding of the impact on site suitability for protected species.</p> <p>The level of detail on the site suitability for protected species indicates that this report may also be covering the remit of a PEA. However, this is not stated definitely. If so, the report does not currently meet all requirements for a PEA, or the underpinning requirements set out in BS 42020.</p> <p>The method statements provided for the protected species surveys do not state what good practice methods were followed or explain the divergences from these (e.g. current good practice for water vole survey requires an early and a late season survey). No method statement is provided for the bat roost suitability assessment. Further, there are no statements on any limitations encountered.</p> <p>The extent of the otter and water vole survey is not clear, especially as the two watercourse types are not</p>	<p>The Applicant notes this comment. The ES will address all habitats present.</p> <p>The Applicant notes this comment. The ES provides a copy of the PEA (document reference 6.3.8.1).</p> <p>The Applicant notes this comment. The ES will state what good practice methods were followed and explain divergences. It will also state limitations encountered.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>readily apparent from the Phase 1 habitat map. A figure should be provided to show the locations of the watercourses surveyed.</p> <p>I am not satisfied with the rationale for scoping out water vole surveys on many of the ditches, which relies on water levels at the time of survey (August). The vegetation descriptions otherwise suggest the presence of suitable habitat, and this species can occupy minor drains (albeit often at much lower density). However, as the chapter clarifies that only one drain needs to be crossed and that suitable stand-offs will otherwise be applied I do not think this needs further discussion/action. The relevant ditch should be surveyed before construction to confirm the status of water vole and the need for mitigation, and a commitment should be provided in the DCO application to this effect.</p>	<p>The Applicant notes this comment. The ES will provide this figure (document reference 6.3.8.9).</p> <p>The Applicant notes this comment. The relevant ditch will be surveyed before construction.</p>
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	<p><u>Appendix 8.2 Ornithological Survey Methods and Results</u></p> <p>A little more clarity/explanation is needed on the survey methods and timings adopted, particularly in relation to Schedule 1 bird species. Specifically, I am not clear if:</p> <ul style="list-style-type: none"> <li>• hobby has been sufficiently considered. This species was recorded but not considered to breed in the area. However, I understand this species to be relatively late breeding. Could breeding activity have been missed given the surveys concluded in early June?</li> </ul>	<p>The Applicant notes this comment.</p> <p>Specific consideration of Schedule 1 species including hobby has been included in the breeding and wintering bird</p>

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			<ul style="list-style-type: none"> <li>• it is reasonable to scope quail out given that the BTO indicates that peak calling by males of this secretive species is early July i.e. a month later than the last survey visit.</li> </ul>	<p>surveys and potential effects assessed.</p> <p>Quail are a highly irruptive summer visitor, with numbers arriving into Britain each summer highly variable. Affected by complex rotational cropping regimes, precise future breeding locations on agricultural land are also impossible to predict. Quail is therefore always a problem species for bird survey, locations / numbers found breeding in one year usually having little relevance to future years. Despite intensive searching specifically for quail during both the 2021 and 2022 breeding bird surveys, none was recorded. Nevertheless, birds</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<ul style="list-style-type: none"> <li>• the appraisal of the local breeding status of barn owl considered all of the features identified in Appendix 8.1. Appendix 8.2 indicates buildings were approached and examined, but it does not state that an internal inspection was made for barn owl.</li> </ul> <p>The viewsheds for each of the identified vantage points should be shown on the plan provided with the report to provide clarity on the land visible from each location. In addition, it should be clarified that both surveyors were present at VP1, as it would not have been possible for a single surveyor to maintain constant observation at this location (given the need to look both north and south at the same time).</p>	<p>could be present in future years. Because of the limited value of the results of current surveys, pragmatic mitigation is therefore outlined in Chapter 8 of the ES (document reference 6.1.8)</p> <p>The Applicant notes this comment. Information on barn owl is contained in Chapter 8 (document reference 6.1.8) The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			The results obtained for each VP, along with plans to illustrate the distribution of the bird survey results, should be provided with the final DCO application.	
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	<p><u>Appendix 8.4 Preliminary Biodiversity Net Gain Calculation- Headline Results</u></p> <p>At present, I am not in a position to comment on, or provide agreement with the statement on, the level of BNG that can be delivered. No evidence has been provided to permit verification of the very high (&gt;200%) BNG predicted. The site condition assessment data and the metric workbook (macro enabled version) should be provided to the Council to support verification of the calculations. The outline LEMP is also needed to allow verification that the proposals are realistic and securable.</p> <p>This is not to suggest that the indicated BNG is not feasible on this large site, only that more information needs to be provided in accordance with the relevant good practice guidance. This includes a need to meet good practice data requirements to evidence the baseline habitat conditions entered into the metric (see comment on this under Appendix 8.1). The guidance accompanying the metric should be referred to when compiling the evidence for the baseline site condition assessment, and when evaluating the post-development habitat conditions.</p> <p>In addition, Natural England advises that “the metric is not a total solution to biodiversity decisions”. While the metric will record a large gain from conversion of</p>	<p>The Applicant notes this comment. The ES will provide additional evidence regarding BNG. This is within Appendix 8.12 (document reference 6.3.8.12)</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>arable farmland to another habitat type, it otherwise needs to be demonstrated that this habitat change is the wider best interests of biodiversity at this location. This needs to be considered in relation to the species dependent on the arable fields to be affected, including birds and scarce arable flora. The output from the metric does not change existing levels of species protection and it does not replace regulatory processes for species protection.</p>	
Chapter 8, Ecology and ornithology	North Kesteven District Council (AECOM)	8 August 2022	<p><u>Appendix 8.5 Badger Survey Report</u></p> <p>The report should be updated to support review and understanding by third parties. Specifically:</p> <ul style="list-style-type: none"> <li>• Clear summary information should be provided for each of the setts present, including provision of a description of each sett, and categorisation of the type of sett (i.e. outlier/subsidiary/main).</li> <li>• A plan should be provided showing the distribution of setts (with the sett number) and other field signs. The current plan is not easy to review given it requires cross referencing back to target notes in the main sett.</li> </ul> <p>There is no need to refer back to historic survey information e.g. prior sett numbers. This data is too old to be relied on and it is confusing to have two different sett numbering systems referred to.</p>	<p>The Applicant notes this comment. They have since updated the report.</p> <p>The Applicant notes this comment. The ES will include such a plan. This is a confidential document but as been submitted as part of the application.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 8, Ecology and ornithology	Environment Agency	16 August 2022	In section 8.59 we are pleased to see recognition for NSIPs to deliver Biodiversity [sic] Net Gain (BNG) through the passing of the Environment Act and that a significant amount of biodiversity enhancements are part of the design which is predicted to amount to over 200% net gain on the existing site.	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Environment Agency	16 August 2022	<p>Our focus is the water related environmental enhancements linked to the Water Framework Directive so we are particularly interested in opportunities around the main river the Head Dike. We recognise the challenge here is that the bigger watercourses are high level carriers so significant habitat improvement on these would most likely need to consider the more complex setting back of embankments to create habitat. This may or may not be feasible within the scheme and if this is an option that can be considered being considered a range of permissions would be required for this including our own flood environmental permit. Our Partnership and Strategic Overview team would be happy to engage in conversations to find a way forward on any flood risk implications.</p> <p>On a smaller scale and for general habitat within the smaller drainage network there are potential ways of improving habitat to be considered, for example to increase the wet marginal areas on the existing drains. This would require consultation with Black Sluice IDB as well as the usual checks and permissions including ecological, water voles especially. There are also some further guides out there for artificial drainage networks</p>	<p>The Applicant notes this comment and consideration was given, however as noted by the EA, management of the Head Dike as a main river precludes significant habitat improvements. Biodiversity net gain of the site is considered further in Appendix 8.12 (document reference 6.3.8.12)</p> <p>The Applicant notes this comment. A setback of 8m has been included should water vole recolonise the drainage ditches on site.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			that have ideas at varying levels of ambition for example <a href="https://www.ada.org.uk/knowledge/environment/">https://www.ada.org.uk/knowledge/environment/</a>	
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	The following comments should be taken in conjunction with previous LWT comments for this proposal sent on 15th Feb 2022 and are informed by BRE (2014) Biodiversity Guidance for Solar Developments. Eds G E Parker and L Green and Natural England Technical Information Note TIN101 © Natural England 2011 First edition 9th September 2011 - Solar parks: maximising environmental benefits. We would also refer readers of these comments to National Policy Statements EN-1, EN-3 and EN-5, NPPF (2021) paragraphs 8c, 174, 180, 182, the Central Lincolnshire Local Plan Policy LP21 Biodiversity and Geodiversity and South East Lincolnshire Local Plan 2011-2036 Policy 28 - The Natural Environment.	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	We are encouraged to read that “No areas of the Development are proposed to be continuously lit during the operational phase of this development” in Paragraph 4.5.33 as well as Paragraph 6.3.25 which states that “There is no permanent lighting proposed as part of the Proposed Development except for localised emergency security lighting in proximity to the substations and control buildings”. LWT take the position detailed in Draft EN-3 which states “Projects should minimise the use of security lighting. Any lighting should utilise a passive infrared (PIR) technology and should be designed and installed in a manner which minimises impact” which is of particular importance considering the effect continuous lighting	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			would have on nocturnal species, especially bats, within and around the Energy Park throughout its operational phase.	
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	<p>LWT would refer to the rates of national habitat loss and species decline listed in the State of Nature Reports 2019. It has been estimated that between 1930 and 1983, 97% of wildflower-rich grasslands were lost in England and Wales (Fuller RM (1987). The conservation of existing and creation of new wildflower meadows is considered to be of national importance (Natural England). Furthermore, Lincolnshire Environmental Records Centre (2018) has recorded that over 900 species of wildlife have not been re-found within the county since 1960 and Lincolnshire as a whole has been losing approximately 1 species of wildflower every 2 years since 1950 ('Our Vanishing Flora' - Plantlife 2012).</p> <p>We agree with the statement in Paragraph 8.1.1 stating "The creation of large areas of renewable energy generation and large area of species rich grassland is likely to lead to a net biodiversity gain..." and acknowledge the inclusion of the headline results of the BNG calculations in Appendix 8.4. While the percentage gain in area habitats is notably high (205.83%) we would expect to see additional net gains in hedgerow units for the 'on-site post intervention' section as a result of the 10.19km of new and 1.98km of enhanced hedgerows as shown in Figure 1.4e. LWT recognise the Applicant is setting a leading example in the sector by demonstrating the possibility for extraordinary high percentage gains on site and we</p>	<p>The Applicant notes this comment. They have set aside some of the site to allow wildflowers to thrive.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			look forward to seeing the full BNG report within the ES chapter.	
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	We acknowledge that Table 8.6 states there are “no conflicts in relation to any defined ‘Biodiversity Opportunity Areas’”. This is consistent with the most recent Biodiversity Opportunity Mapping conducted by the Greater Lincolnshire Nature Partnership (GLNP) on behalf of the Local Planning Authority. We appreciate that the applicant has used the Lincolnshire Environmental Records Centre (LERC) and the National Biodiversity Network (NBN) to inform the PEIR, as stated in Paragraphs 8.3.5 and 8.3.6, in accordance with draft EN-3 section 2.50 as well as the comments provided by LWT during the non-statutory consultation phase of the proposal.	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	We note that in Paragraph 8.1.1 you state that “There are no designated sites of international, national or local importance within or adjacent to the Energy Park Site.” In Paragraph 8.4.5 it is stated that “The route for the proposed off-site Grid Connection has not been finalised.” and that “Both cross the A17, the South Forty Foot Drain and the railway”. We are encouraged to read that “Direct drilling under the South Forty Foot Drain will ensure no negative effects on the Local Wildlife Site” as stated in Paragraph 8.1.1.	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	We acknowledge the description of ecological enhancements intended for the site regarding the “drought resistant species rich seed mix suitable for low density sheep grazing with no additional fertiliser” in Paragraph 8.5.4 and that a “nature conversation species rich seed mix will be used in the areas between	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>the fenced Energy Park and the drainage ditches". This demonstrates where the most practicable gains in biodiversity can be found on solar farms and is consistent with the advice and recommendations given in BRE (2014) Biodiversity Guidance for Solar Developments. Eds G E Parker and L Greene and Natural England Technical Information Note TIN101 © Natural England 2011 First edition 9th September 2011 - Solar parks: maximising environmental benefits.</p>	
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	<p>Paragraph 8.5.105 states that both the 96ha of BNG land and 46ha of land between the fenced area and drainage ditches "will be sown nature conservation seed mix to provide nesting habitat for farmland birds and habitat for insects and pollinators." Given the stark decline in farmland birds since the 1970s LWT reiterate the point made during the previous comments for optimal ground-nesting habitat of sufficient size for breeding birds particularly those that require large expanses around them, such as lapwing and skylark. We would also support 'skylark plots' to be incorporated into the LEMP as mitigation in the form of species-rich grassland managed in close proximity to more species rich grassland among arrays which would provide additional, higher quality foraging habitat. These two habitat requirements are essential, not one or the other. We want the solar industry to work together within Greater Lincolnshire to collectively address the need for creating habitat for the ground nesting birds that require large vistas to address cumulative impacts the industry may have on those species.</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	In Paragraph 8.5.106 we learn that “shade tolerant species, including agricultural weed species such as dock and thistle, [may start becoming] established beneath the array strings and outcompeting other species”. Where ‘shade-cuts’ might be required for panel arrays, we would highlight this as opportunity to maintain ‘flowering lawns’ which would incorporate only native species including butterfly foodplants such as Common Sorrel and Common Bird’s-foot Trefoil together with other mowing/grazing resistant species such as Red Clover, Selfheal, Lady’s Bedstraw, Black Medick and Yarrow while avoiding Perennial Rye-grass and White Clover due to their tendency to be invasive. This would result in extending the flowering season of these strips and maximizing native species-rich grassland area.	The Applicant notes this comment. They will continue working with a team of environmental specialists on this issue. The outline Landscape Strategy can be seen in the OLEMP (document reference 7.8)
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	LWT are encouraged to learn in Paragraph 8.5.109 we that “The new hedgerow will include a wide range of species...” and that “once established will be managed on a suitable rotation of cutting and managed to keep a low and tight structure to provide nesting habitat for farmland bird species”. Boundaries should ideally feature occasional standard trees and more trees on northern boundaries where appropriate. Trees should be allowed to mature and senesce as safety permits. We would recommend that where possible, standing dead wood should be retained, even as monoliths. If felling must be undertaken for safety, this should be minimised and we would call for dead wood to be retained in boundaries as habitat.	The Applicant notes this comment. They will continue working with a team of environmental specialists on this issue. The detail of the Landscape Strategy can be seen in the OLEMP (document reference 7.8)

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	<p>In Paragraph 8.5.3. we learn that there will be “a minimum standoff from all Black Sluice IDB maintained drainage ditches of 9m and all other ditches of 8m, which in total will amount to approximately 46ha”. This is encouraging as it is above the minimum standard called for by the LWT although in Paragraph 8.5.111 we learn that “There will be no change in the management of Non IDB internal drainage ditches.” LWT would prefer to see opportunities taken to enhance wet boundaries with native herbaceous vegetation and to maintain high light levels to enhance riparian and aquatic habitat. The presence of mink is noted and presents the opportunity for further enhancement of riparian habitat through invasive species control and should be strongly considered by the Applicant. We would be happy to offer guidance on invasive species control based on providers we have worked with successfully in the past.</p>	<p>The Applicant notes this comment. They will continue engaging with Lincolnshire Wildlife Trust on invasive species control.</p>
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	<p>We are encouraged to read in Paragraph 8.5.41 that “Prior to each stage of construction, a badger survey will be conducted in sufficient time for appropriate mitigation measure to be in place” and “The creation of construction exclusion zones delineated by Heras fencing where appropriate to control direct impacts to setts”. Following our previous comments, we would insist that any fencing would not extend below the ground surface where this would conflict with Badger activity and that ‘Badger gates’ would be considered for ensuring site boundary permeability for this species. To further this point LWT also insist a 30m buffer established from setts through panel layout design as is</p>	<p>The Applicant notes this comment. They will continue working with a team of environmental specialists to ensure the development is sensitive to badger activity, including the provision of badger gates in fencing.</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>stated in the scoping report Paragraph 8.49. We also note that Paragraph 8.5.2 states “the fence design will include gaps to allow mammals to pass underneath at strategic locations”, this is of particular importance when considering the lifespan of the project and the species recorded during site surveys described in Paragraphs 8.4.24 to 8.4.35. We agree with the mitigation described for badgers in Paragraph 8.5.41 and would stress the importance of consulting with Natural England for mitigation in the LEMP and CEMP.</p>	
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	<p>We acknowledge the GCN eDNA survey, carried out in April 2022, returned no conclusive results pertaining to the presence of GCN within the site boundary. LWT also acknowledge that a District Licence scheme for GCN mitigation may apply to Lincolnshire during the application process and would stress that best practice is adhered to at all times and we will look to consult where appropriate if matters progress under mitigation licence or under a District Licence Scheme where applicable.</p>	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Lincolnshire Wildlife Trust	16 August 2022	<p>The Lincolnshire Wildlife Trust hopes these comments are helpful at this stage and welcomes further discussion relating to the points covered.</p>	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Boston Borough Council	25 August 2022	<p>The proposed route of the cable would cross or be within proximity to South Forty Foot Drain Local Wildlife Site, listed buildings and Conservation Area within Bicker, along with a number of undesignated watercourses, drains and verges.</p>	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Boston Borough Council	25 August 2022	<p>In addition, cumulative effects of the cabling works of several other local schemes proposed at Temple Oaks, Folkingham and Bicker Solar Farm should be taken into</p>	The Applicant notes this comment. Cumulative effects

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			account as these schemes also propose cabling works to connect to National Grid at Bicker. The potential for cumulative impacts on residential amenity, the environment and heritage assets should be taken into account, along with any proposed mitigation in relation to traffic movements, dust and noise impacts, especially during construction phases.	are considered within the individual ES chapters where relevant.
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	Please refer to the detailed comments provided by AECOM at Appendix 1. In summary, AECOM note that at present the information in the PEIR does not meet minimum requirements for a habitat survey report and is not adequate as an evidence base to support the Biodiversity Net Gain (BNG) assessment. In places there is insufficient description and botanical information provided for some habitats, including the grasslands and the phase 1 habitat map and descriptions do not appear to address all habitats present.	The Applicant notes this comment. Further reports supplement the ES compared the PEIR, they are appended to Chapter 8 (6.3.8.1-6.3.8.12).
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	<u>Table 8.5</u> The ES should also consider/refer to CLLP policy LP20 Green Infrastructure Network and the CL Biodiversity Opportunity Mapping Study	The Applicant notes this comment. The ES considers this policy and mapping study.
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	<u>Table 8.6</u> The discussion doesn't directly address PINS comment in the ES Scoping which relates to light/space/water availability to underlying arable land/vegetation; rather it is focussed on whether light is reflected onto the panels	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	<u>8.5.4</u> The focus of the BNG summary/proposals seems to be on seeding the ground rather than planting of trees,	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>shrubs etc. A seed mix is proposed for both the 96ha BNG habitat and the area underlying the panels on the energy park site. There is reference to local sheep flock low density grazing. Can 'low density' be defined and is there any comparable agricultural 'value' assigned to reverting from arable cropping to low grazed pasture (see also below in relation to agricultural land impacts). How will grazing be guaranteed/secured? The proposed BNG area appears to have only seasonal grazing i.e. lesser intensity than the energy park site (although relative stocking densities/relative periods or % of time that sheep will be grazed across the BNG area and energy park site is not directly stated). The scope for agricultural continuance on the BNG land therefore seems (deliberately) more reduced than compared with the main energy park site.</p>	<p>Proposed sheep grazing densities are discussed in the OLEMP (document ref 7.8) and Savills Report (document reference 6.3.16.1). Sheep grazing, coupled with energy production exceeds the current agricultural value. Grazing is further outlined in the OLEMP (document reference 7.8) - to be secured via the DCO.</p>
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	<p><u>8.5.19</u> The ES should identify where the 500m section subject to potential root compaction or disturbance is by reference to a full BS:5837 Tree Survey and constraints plan which should accompany the DCO application. Given the modest areas of woodland cover as a proportion of the overall 586ha site area NKDC would expect that there is no incursion into any RPAs given the ability for localised re-routing/re-siting of tracks and infrastructure.</p>	<p>The Applicant notes this comment.</p>
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	<p><u>8.5.43</u> Presumably the 8m/9m buffer around edge of retained hedgerows and ditches is sufficient to enable continued bat foraging?</p>	<p>The buffer is sufficient for bat foraging.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	<u>8.5.102 and 8.5.104</u> As referred to above and in relation to ‘alternatives’ the ES should describe and detail the degree/intensity of grazing and subsequent management of the BNG land. Whilst in isolation the BNG % which is deemed deliverable is potentially significant, this might be tempered by the loss of continuance of agricultural activity on the BNG land which is assessed as largely ALC 1 and 2 categories (Fig. 16.1).	The Applicant notes this comment. The OLEMP will detail the intensity of grazing in the Energy Park site
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	<u>8.5.110</u> See above with reference to paragraph 8.5.19. Some inconsistency in terms of whether woodland will be impacted or not?	The Applicant notes this comment. There will be no loss of woodland from this proposed development.
Chapter 8, Ecology and ornithology	North Kesteven District Council	1 September 2022	<u>8.5.119</u> The ES should correlate areas of proposed retained/reinforced and new hedgerow planting with the location of infrastructure that needs to have external lighting for operational purposes and then propose details of the type of lighting, lux levels, cowling, the means of operation (e.g. PIR etc).  Finally – please see the attached appendix document from AECOM. Whilst AECOM do not consider that there are any significant omissions they raise a number of general points where further clarification is required, notably: • Section 8.3 – need to define study area/zone of influence	The Applicant notes this comment.  The Applicant notes this comment. They have had regard to the full response provided by AECOM (within this appendix).

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<ul style="list-style-type: none"> <li>• 8.3.7 – need to provide the PEA in support of the ES; PEA not provided at this stage</li> <li>• 8.3.10 – need to reference good practice measures/guidance</li> <li>• Need to provide an assessment of future baseline condition</li> <li>• Relevant impacts need to be more clearly identified, quantified and assessed in relation to breeding birds</li> <li>• At present the information in the PEIR does not meet minimum requirements for a habitat survey report and is not adequate as an evidence base to support the Biodiversity Net Gain (BNG) assessment. In places there is insufficient description and botanical information provided for some habitats, including the grasslands. The phase 1 habitat map and descriptions do not appear to address all habitats present</li> <li>• The method statements provided for the protected species surveys do not state what good practice methods were followed or explain the divergences from these (e.g. current good practice for water vole survey requires an early and a late season survey). No method statement is provided for the bat roost suitability assessment.</li> <li>• AECOM are not satisfied with the rationale for scoping out water vole surveys on many of the ditches, which relies on water levels at the time of survey (August). The vegetation descriptions otherwise suggest the presence of suitable habitat, and this species can occupy minor drains (albeit often at much lower density). However, as the chapter clarifies that only one drain needs to be crossed and that suitable</li> </ul>	

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>stand-offs will otherwise be applied this does not necessarily need further discussion/action.</p> <ul style="list-style-type: none"> <li>• Appendix 8.2 – some further clarity/explanation is needed on the survey methods and timings adopted; including further details in relation to hobby and barn owl</li> <li>• Appendix 8.4 (preliminary BNG) – a 200% BNG is noted. The site condition assessment data and the metric workbook (macro enabled version) should be provided to the Council to support verification of the calculations. The outline LEMP is also needed to allow verification that the proposals are realistic and securable.</li> </ul>	
Chapter 8, Ecology and ornithology	Natural England	1 September 2022	The PEIR has assessed the potential impacts on designated sites. At the time of writing survey work is still ongoing however Natural England agree that given the extensive foraging areas used by the Wash pink-footed Goose population that it is unlikely that there would be any effect on the conservation status of the SPA.	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Natural England	1 September 2022	<p><u>Protected Species</u></p> <p>Natural England has produced standing advice<sup>1</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.</p> <p>Natural England welcome the commitment to submit a Biodiversity Net Gain (BNG) calculation using</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			Biodiversity Metric 3.0 as part of the draft Landscape and Ecological Management Plan (LEMP)	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Natural England	1 September 2022	<u>Mitigation and Enhancement</u> Natural England welcome the measures outlined in paragraphs 8.6.1 to 8.6.15	The Applicant notes this comment.
Chapter 8, Ecology and ornithology	Lincolnshire County Council	6 September 2022	<p>LCC does not have an in-house ecologist however having reviewed the information contained within the PEIR, the approach taken thus far appears reasonable and we have no specific comments to offer at this stage other than the following:</p> <ul style="list-style-type: none"> <li>• Paragraph 8.5.3 onwards - the area of land for the Energy Park is 586.85ha which includes the biodiversity net gain area (96ha) and a Community Orchard (1.8ha). The area where the solar panels and associated equipment will be located covers an area extending to around 440ha. Paragraph 8.5.102 confirms that the Energy Park will be built entirely within the current arable fields and that these will be seeded to create grass pasture to be grazed by local sheep flocks at low density. Whilst the change from intensive arable agriculture to grassland habitat may offer benefits in terms of biodiversity those benefits must be balanced against the impact/loss of this land from productive use. Low density sheep grazing of the same area is not a like for like replacement in terms of value and more information is therefore required on what low density grazing means in order that a comparison of agricultural 'value' between the current arable use and proposed pasture use is understood – see later comment under Land Use and Agriculture</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The detail of the current farming on the site is discussed in Appendix 16.1 (document reference 6.3.16.1) and proposed sheep grazing is within the OLEMP (document reference 7.8).</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	South Kesteven District Council	12 July 2022	We defer to Lincolnshire County Council (as local highway authority and lead local flood authority) in respect of any comments in relation to highways and flood risk impacts.	The Applicant notes this comment.
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	Environment Agency	16 August 2022	<p>We are in discussions with the developer and consultants regarding this development and so are well aware of the detail.</p> <p>The submission has included some detail regards the flood risk in Chapter 9 of the PEIR but not in the form of a flood risk assessment (FRA). Our discussion with the consultants regarding Breach Analysis will inform the submission of a FRA. We will likely have more comments to make once this has been agreed.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. They have carried out a Flood Risk Assessment (document reference 6.3.9.1). A specialist hydraulic modelling assessment has also been completed and is discussed further in Chapter 9 of the ES (document reference 6.1.9).</p>
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	Environment Agency	16 August 2022	Accordingly, we have no comments to make on the PEIR and will continue to discuss flood risk with the consultants other than to repeat our previous advice to the applicant is aware of the flood risk permitting requirements.	The Applicant notes this comment.
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	Environment Agency	16 August 2022	We request early engagement with ourselves should the underground cable to Bicker Fen Sub Station go under the South Forty Foot Drain. We do have certain	The Applicant notes this comment. The cable will need to go



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>exemptions where service crossings are completed by means of horizontal directional drilling not using an open cut technique – known as Exemption FRA 3. Details of Exemption FRA 3 can be found here: Exempt flood risk activities: environmental permits - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</p>	<p>underneath the South Forty Foot Drain. Accordingly, the Applicant will continue engaging with this consultee regarding this issue.</p>
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	Boston Borough Council	25 August 2022	<p>The proposed route of the cable would cross or be within proximity to South Forty Foot Drain Local Wildlife Site, listed buildings and Conservation Area within Bicker, along with a number of undesignated watercourses, drains and verges. Works to watercourses may require the consent of the Internal Drainage Boards.</p>	<p>The Applicant notes this comment.</p>
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	Network Rail	30 August 2022	<p>Key concerns will be how the scheme impacts on the railway operations in terms of glint and glare issues causing distraction for train drivers approaching and passing the site, how any issues of this nature that may arise are to be mitigated, the management of construction works around the operational railway and details such as boundary treatments, any lighting and drainage schemes that may impact on the operational railway.</p>	<p>The Applicant notes this comment. They will continue engaging with Network Rail on these issues.</p>
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	North Kesteven District Council	1 September 2022	<p>The PEIR has identified the inconsistency in relation to the sequential test and flood risk vulnerability classification and whether Solar Farms are specifically identified as Essential Infrastructure (EI) including in the EN-1 draft. The NPPG does not specifically refer to solar farms as EI in the paragraph 066 Reference ID: 7-066-20140306 whereas the NPPF does in Annex 3. The ES should identify this discrepancy and the Planning</p>	<p>The Applicant notes this comment. The ES will address this issue.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>Inspectorate should consider the land use planning implications of this inconsistency in reference.</p> <p>Depending on the case presented to (and subsequently adopted by) PINS through submission of the DCO application, nevertheless it is our understanding that the flood risk sequential test will still be applicable in our interpretation of 'Table 2: Flood risk vulnerability and flood zone 'incompatibility'. The first bullet point in the 'notes to table 2' states that 'this table does not show the application of the Sequential Test which should be applied first to guide development to the lowest flood risk areas; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea'.</p> <p>The Council notes though that the maximum area across which the FRST will be applied is the 9km search area variously referred to in the 'alternatives; sections of the PEIR. There is no information in the PEIR regarding potential slab levels for substations, the BESS or other elements of critical infrastructure that need to be elevated above flood levels nor in relation to the flood- defence bund referred to.</p>	<p>The Applicant notes this comment. The flood risk sequential test will still be applicable and is within the Appendix 9.1 FRA (document reference 6.3.9.1).</p> <p>The Applicant notes this comment. The ES provides information on elevation of flood sensitive infrastructure.</p>
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	North Kesteven District Council	1 September 2022	<p><u>9.3.3</u> We note that paragraph 9.3.3 references potential adverse effects resulting from compaction of the ground caused by construction plant and an increase in the extent of impermeable surfaces associated with access roads and compound areas. Paragraph 9.4.34 considers embedded mitigation and references 'best</p>	Landscape's response (referenced in this comment is provided in full in Appendix 17).

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>practice working methods to prevent both water pollution and adverse impacts upon the surface water drainage regime' however this does not specifically refer to whether and how soil compaction stemming from vehicle tracking across the site can be mitigated/remedied to avoid the localised surface water incidents evidenced by Landscape (see below) on solar parks elsewhere</p>	
<p>Chapter 9, Hydrology, hydrogeology, flood risk and drainage</p>	<p>North Kesteven District Council</p>	<p>1 September 2022</p>	<p><u>9.3.26</u>  The PEIR has identified the inconsistency in relation to the sequential test and flood risk vulnerability classification and whether Solar Farms are specifically identified as Essential Infrastructure (EI) including in the EN-1 draft. The NPPG doesn't specifically refer to solar farms as EI in the paragraph 066 Reference ID: 7-066-20140306 whereas the NPPF does in Annex 3. The ES should identify this discrepancy and the Planning Inspectorate should consider the land use planning implications of this inconsistency in reference. Depending on the case presented to (and subsequently adopted by) PINS through submission of the DCO application, nevertheless it is our understanding that the flood risk sequential test will still be applicable in our interpretation of 'Table 2: Flood risk vulnerability and flood zone 'incompatibility''. The first bullet point in the 'notes to table 2' states that 'this table does not show the application of the Sequential Test which should be applied first to guide development to the lowest flood risk areas; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea'.</p>	<p>The Applicant notes this comment. The ES will address this issue. The flood risk sequential test will still be applicable and is considered within the FRA.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	North Kesteven District Council	1 September 2022	<p><u>9.5.16</u> Essential Infrastructure could be deemed as being exempt, whereas all other development types contained within the flood risk vulnerability classification table require application of the FRST. The Council does however note that owing to the direction made by PINS in their Scoping Opinion the maximum area across which the FRST will be applied is the 9km search area variously referred to in the ‘alternatives’ sections of the PEIR.</p>	The Applicant notes this comment.
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	North Kesteven District Council	1 September 2022	<p><u>9.5.19</u> The ES should confirm whether panel rows will have dedicated soakaways to the front of the panels or whether rainfall will infiltrate without dedicated formation of soakaways. This should also take into account the issue of soil compaction associated with construction.</p> <p>Does this presume that no compensation is needed elsewhere on the site i.e. lowering of levels or creation of floodplain compensation or is coverage by raised floor slabs (i.e. in connection with the substations and BESS) so minimal as a proportion of the overall site that no compensation is needed? There is no information in PEIR regarding potential slab levels for substations, the BESS or other elements of critical infrastructure that need to be elevated above flood levels nor is there a summary of the Flood Risk Sequential Test outcomes including within the 9km search area and alternative site assessments. This section of the PEIR makes no reference to the potential flood defence bund referred</p>	<p>The Applicant notes this comment. A drainage strategy (including the use of swales) is included as part of the Flood Risk Assessment at document reference 6.3.9.1. An outline soil management plan is appended to the Outline Construction and Environmental Management Plan (document reference 7.7)</p> <p>The ES provides information on elevation of flood</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			to in table 4.3. Information relating to the bund (height/composition – including whether formed of stored BMV topsoils) should be set out in the ES.	sensitive infrastructure.
Chapter 9, Hydrology, hydrogeology, flood risk and drainage	Lincolnshire County Council	6 September	<ul style="list-style-type: none"> <li>• LCC, as the Highway &amp; Lead Local Flood Authority, has commented that there will need to be a standard Food Risk Assessment and Drainage Strategy for surface water flood risk, keeping run off to greenfield rates and using SUDs techniques, submitted as part of the final ES. Whilst the PEIR confirms one will be produced a copy of the FRA does not appear to have been provided at this stage. One will therefore be required as part of the final ES.</li> <li>• You are therefore advised to continue to liaise with the Highway &amp; Lead Local Flood Authority contacts in order that detailed discussions can continue.</li> <li>• Further comments will be provided as the project continues and the Environmental Statement is completed.</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 10, Cultural heritage	Historic England	20 July 2022	We are pleased to see that the upstanding buildings of Six Hundreds Farm, the wall to the west of Elm Grange, and the drainage pump at Head Dyke will be retained within the development layout and that they will be protected during construction. The additional Cultural Heritage works as identified in 10.4.22, 10.5.10, 10.6.2, & 10.6.3 should, in discussion with Lincolnshire County Council, North Kesteven District Council and Boston Borough Council, inform the final site layout.	The Applicant is grateful to receive this positive feedback regarding the cultural heritage aspects of their plan.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			The impacts on the Grade I Listed Kyme Tower at South Kyme, and potential mitigation required, should be discussed with Historic England once the assessment is completed.	Historic England and the Local Authorities and their advisors are consultees on this DCO.
Chapter 10, Cultural heritage	Historic England	20 July 2022	<p>Chapter 10 Cultural Heritage - Historic England agree with the general approach as outlines in the PIER.</p> <p>Discussion should continue with Lincolnshire County Council, North Kesteven District Council and Boston Borough Council, regarding any further works required.</p> <p>The impacts on the Grade I Listed Kyme Tower at South Kyme, and potential mitigation required, should be discussed with Historic England once the assessment is completed.</p>	<p>The Applicant notes this comment.</p> <p>Dialogue has been ongoing with the listed stakeholders.</p> <p>The Applicant has considered Kyme Tower in the Cultural Heritage chapter of the ES (document reference 6.1.10)</p>
Chapter 10, Cultural heritage	Historic England (Science Advisor)	5 August 2022	<p>I was wondering if you had any specific details on the directional drilling (depths etc.), and had started to flesh out any mitigation yet?</p> <p>I'd be happy to have a chat on the phone if that's be quicker or easier for you. I'm on site most of next week (and on leave the week after), but can easily set aside time for a catchup if that's useful.</p>	Per the email, the Project Manager called the consultee.
Chapter 10, Cultural heritage	Boston Borough Council	25 August 2022	The proposed route of the cable would cross or be within proximity to South Forty Foot Drain Local Wildlife Site, listed buildings and Conservation Area	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			within Bicker, along with a number of undesignated watercourses, drains and verges.	
Chapter 10, Cultural heritage	Boston Borough Council	25 August 2022	In addition, cumulative effects of the cabling works of several other local schemes proposed at Temple Oaks, Folkingham and Bicker Solar Farm should be taken into account as these schemes also propose cabling works to connect to National Grid at Bicker. The potential for cumulative impacts on residential amenity, the environment and heritage assets should be taken into account, along with any proposed mitigation in relation to traffic movements, dust and noise impacts, especially during construction phases.	The Applicant notes this comment. They will account for these cumulative effects where relevant.
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<p>The Heritage Trust of Lincolnshire (HTL) have reviewed the PEIR and a note of their full comments is attached as Appendix 2. In summary, HTL note that since the completion of the geophysical surveys (reported in the PEIR) proactive and ongoing discussions have been held with applicant's archaeological advisors. HTL advise that the stages of work under discussion include the assessment and presentation of further information to develop an appropriate programme of trial trenching for the Energy Park and an assessment and geophysical survey of the cable route options.</p> <p>Geophysical survey has been carried out at the Energy Park, however, not all areas within the redline [sic] boundary for the Energy Park were included. There is a notable variation in presentation and interpretation of detail across the four surveyed areas and few anomalies were interpreted as being of archaeological origin. Palaeochannels were recorded by the survey</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The areas outside the red line are now outside the Order limits.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>however, the archaeological potential of the roddons (exploitation of slightly higher, drier land in the prehistoric and Roman periods demonstrated on land immediately to the east of the Energy Park) and the potential for paleoenvironmental evidence in this landscape have not been considered. This was highlighted by NKDC in their scoping response to PINS.</p> <p>On the basis of ongoing work, at this stage the Council does not agree with the statement that impacts upon the potential buried archaeological resource would be 'not significant'. Consequently, all value judgements made about the significance of effects of the development on buried archaeology should potentially be assessed as higher than currently noted until further evaluation has been undertaken to provide evidence of presence or absence. As such we consider that the overall conclusions drawn at this stage must be considered to be provisional at best.</p>	<p>The Applicant notes this comment. Further information is available in Chapter 10 of the ES (document reference 6.1.10).</p>
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<p><u>HTL general comments</u></p> <p>The Heritage Trust of Lincolnshire have reviewed the PEIR and a note of their full comments is appended to this reply. In summary, HTL note that since the completion of the geophysical surveys (reported in the PEIR) proactive and ongoing discussions have been held with applicant's archaeological advisors. HTL advise that the stages of work under discussion include the assessment and presentation of further information to develop an appropriate programme of trial trenching for the Energy Park and an assessment and geophysical</p>	<p>The Applicant notes this comment.</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>survey of the cable route options. HTL's comments in summary are that:</p> <ul style="list-style-type: none"> <li>• The PEIR references key data sources for the baseline data collation which includes some, but not all the sources expected to inform the desk-based assessment. It should include an aerial photographic assessment (including National Mapping Programme (NMP)) data and Portable Antiquities Scheme (PAS) data. LiDAR data has been noted in the list of sources (as previously recommended), however, the results are not included in the PEIR.</li> <li>• It is stated that the description of the baseline conditions provided in the PEIR 'focusses primarily on the Energy Park Site and its environs; data gathering and analysis is ongoing for the off-site cable route and grid connection at Bicker Fen Substation' (10.4.4.). Therefore the summary of the assessment results refers to the Energy Park only. The information appears to be drawn from the Historic Environment Record (HER) and other data sources as listed together with the summary results of the geophysical surveys; however, it does not include reference to or description of assessments of the LiDAR data or aerial photographs.</li> <li>• There is no illustration of the search area, location and distribution of the identified heritage assets included in the PEIR.</li> </ul>	<p>The Applicant notes this comment. Further information is available in Chapter 10 of the ES (document reference 6.1.10).</p> <p>The Applicant notes this comment. Further information is available in Chapter 10 and its appendices including LiDAR imagery (document reference 6.1.10 and 6.3.10.1).</p> <p>The Applicant notes this comment. The ES will provide an illustrate of the search area.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<ul style="list-style-type: none"> <li>• Geophysical survey has been carried out at the Energy Park, however, not all areas within the redline boundary for the Energy Park were included. There is a notable variation in presentation and interpretation of detail across the four surveyed areas and few anomalies were interpreted as being of archaeological origin. Palaeochannels were recorded by the survey however, the archaeological potential of the roddons (exploitation of slightly higher, drier land in the prehistoric and Roman periods demonstrated on land immediately to the east of the Energy Park) and the potential for palaeoenvironmental evidence in this landscape have not been considered. This was highlighted by NKDC in their scoping response to PINS.</li> </ul>	The Applicant notes this comment. Further information is available in Chapter 10 of the ES (document reference 6.1.10).
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<ul style="list-style-type: none"> <li>• The geophysical survey has not been undertaken in some of the proposed BNG areas. If the BNG areas are to be permanently excluded, with no construction activity or groundworks (including landscaping) then these areas should be defined and excluded/protected through all phases of the Proposed Development. If groundworks may be carried out in these areas then geophysical survey, (followed by trial trenching) will be required to assess the archaeological potential and likely impacts.</li> </ul>	The Applicant notes this comment. They intend to permanently exclude these areas.
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<ul style="list-style-type: none"> <li>• The results of the full desk-based assessment, including the LiDAR and aerial photographic assessments, need to be collated with the geophysical survey results in order to design an appropriate programme of trial trenching to determine the presence, character, date and significance of</li> </ul>	The Applicant notes this comment. Further information is available in Chapter 10 of the ES (document reference 6.1.10).

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			archaeological remains and inform the archaeological mitigation strategy.	
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<ul style="list-style-type: none"> <li>The assessment of baseline conditions and significance of identified archaeological remains given in the PEIR is incomplete. Therefore, the assessment of direct effects (truncation of archaeological remains) at construction and operation phases is limited to the assets as currently described and is incomplete. The likely significant effects (direct and indirect) will require reassessment in the light of further information from the next stages of work and the results of the trial trenching. Likewise the Summary of Effects, Mitigation and Residual Effects (Table 10.4) is limited to the information recorded in the PEIR and will need to be revised in the light of further work.</li> </ul>	The Applicant notes this comment. Further information is available in Chapter 10 of the ES (document reference 6.1.10).
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<ul style="list-style-type: none"> <li>Whilst the PEIR notes that decommissioning will have no direct physical effects on the archaeological resource, as above the extent and significance of the archaeological resource has not been fully assessed. At this stage it is not possible to conclude that decommissioning will not impact on any archaeological remains and therefore proposals for decommissioning should include consideration of the heritage assets (buried archaeological remains and built-heritage) and make provision for the protection/mitigation of remains that may be identified through archaeological evaluation process.</li> </ul>	The Applicant notes this comment. Further information is available in Chapter 10 of the ES (document reference 6.1.10).
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	In terms of data sources several of the websites listed prohibit the reproduction of maps without specific license, evidence of copyright permission will therefore need to be provided. Data sources referred to should	The Applicant notes this comment. Further information is available in Chapter

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			include Portable Antiquities Scheme (PAS) data, local sources and non-map material held by the Lincolnshire Archives. A map regression is also requested and which should include all available maps to provide a reasonable understanding of the development and time depth of the site.	10 and its appendices (document reference 6.1.10 and 6.3.10.1).
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	No aerial photography sources are listed in the identified data sources and we would expect a full competent LiDAR and air photo analysis, including interpretation and assessment, informed by full aerial photo coverage using all available oblique and vertical air photos including the Historic England Archive and Cambridge University Collection of Air Photos as well as RAF and Ordnance Survey photos including those held by Lincolnshire County Council. The Lincolnshire Archaeology Handbook should also be included and referenced as a data source as this informs good practice and methodology approaches for archaeological work undertaken in the County.	The Applicant notes this comment. Further information is available in Appendix 10.1 of the ES (document reference 6.3.10.1).
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<u>10.3.45 (onwards)</u> There is no reference to the NKDC conservation area appraisal (CAA) for Heckington or the adopted NKDC criteria for the identification of non-designated heritage assets to validate the inclusion of Mill Green House and Sidebar Chapel. Whilst NKDC does not necessary disagree with their inclusion the ES should include a copy of a completed criteria form (accessible at <a href="https://www.n-kesteven.gov.uk/residents/planning-and-building/planning/conservation-and-heritage/local-list-of-nondesigned-heritage-assets/">https://www.n-kesteven.gov.uk/residents/planning-and-building/planning/conservation-and-heritage/local-list-of-nondesigned-heritage-assets/</a> ). Paragraph 10.3.47 considers only demolition or	The Applicant notes this comment. Conservation areas and operational impacts are covered in the ES Chapter (document reference 6.1.10).

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			truncation as a potential physical direct effect of construction or decommissioning. However there is also the potential construction impacts of compaction, machine tracking and reduction of protective depths of soil, as well as the potential effects on the moisture levels and chemical composition of the soils all of which may have an impact upon surviving archaeology. Any proposed mitigation measures such as landscaping, tree planting or habitat construction could also lead to potential impacts on surviving archaeology and settings impacts.	
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<u>10.5.4</u> At this stage the Council does not agree with the statement that impacts upon the potential buried archaeological resource would be 'not significant'. The impacts listed in paragraphs 10.5.1 to 10.5.3 are below the depth of any surviving archaeology and paragraph 10.5.3 notes that construction activities would truncate and/or remove known and potential buried remains.	The Applicant notes this comment. Further information is available in Chapter 10 of the ES (document reference 6.1.10).
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<u>10.5.8</u> The applicant should ensure that Historic England agree with the overall conclusions and assessment in relation to Holme House	The Applicant notes this comment.
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<u>10.5.11</u> Distant views of St Botolphs Parish Church Boston ('Boston Stump') are visible from parts of the site	The Applicant notes this comment.
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<u>10.8.7 and 10.8.8</u> The immediate and future potential impacts of planting and landscaping will need to be investigated and understood with a detailed competent basis of site specific information on the extent, depth and	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>significance of any surviving archaeology which may be impacted. The potential impact of the proposed planting and other proposed on site mitigation measures (such as the formation of bunds) on the setting and significance of heritage assets also needs to be determined.</p>	
Chapter 10, Cultural heritage	North Kesteven District Council	1 September 2022	<p><u>General comment</u>  As previously stated, all mitigation work will need to be completed prior to commencement other than in areas where monitoring is agreed as part of an appropriate mitigation strategy. The full potential impact zone, including all proposed connection corridors as well as the main development site will need to undertake sufficient evaluation to allow for a programme of suitable mitigation. The full extent of the proposed impact area including the connector route corridors must be included in the evaluation process as archaeological impacts and subsequent mitigation have the potential for significant financial and scheduling impacts. The full potential impact zone will require geophysical survey and trial trenching to identify site-specific archaeological potential and subsequent mitigation.</p> <p>As also noted by HTL, the PEIR and appendices contain only relatively limited discussion in relation to heritage impacts; including in relation to archaeological impacts. To date no information has been presented in relation to the scale of harm anticipated to the setting and significance of designated and non-designated heritage assets and as such NKDC cannot offer any specific</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>comment. The archaeology which may be impacted upon cannot be monitored or recorded during the groundworks and so the potential impact of the development at this stage is unknown and the conclusions made based on only partial results with most of the archaeological evaluation phases still to come; as confirmed through the HTL advice. Consequently, all value judgements made about the significance of effects of the development on buried archaeology should potentially be assessed as higher than currently noted until further evaluation has been undertaken to provide evidence of presence or absence. As such the overall conclusions drawn at this stage in Chapter 10 (in the absence of the results and analysis of trial trenching) must be considered to be provisional at best.</p>	
Chapter 10, Cultural heritage	North Kesteven District Council (Heritage Lincolnshire)	August 2022	<p>Preliminary Environmental Information Report (PEIR) submitted for Development Consent Order Application for Ground Mounted Solar Panels, Energy Storage Facility, Below Ground Grid Connection to Bicker Fen Substation and All Associated Infrastructure Works at Land at Six Hundreds Farm, Six Hundred Drove, East Heckington, Sleaford, Lincolnshire (June 2022). 'The PEIR presents the preliminary findings of the EIA process in accordance with Regulation 12 of the EIA Regulations.' The Proposed Development is described as including the 'Energy Park' and the offsite cable route (grid connection to the Bicker Fen Substation). At the time of the PEIR, the proposal of the final cable route for the grid connection has not been agreed and two options are assessed.</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 10, Cultural heritage	North Kesteven District Council (Heritage Lincolnshire)	August 2022	<p><u>Cultural Heritage (Chapter 10 and appendices)</u>  The PEIR considers the 'likely significant effects of the proposals on cultural heritage receptors including buried archaeological remains, historic earthworks, and historic buildings and structures.' Stating that it is informed by an archaeological desk-based and setting assessments and geophysical surveys (Appendix 10.1 provides the Summary Report of Geophysical Survey Results).</p>	The Applicant notes this comment.
Chapter 10, Cultural heritage	North Kesteven District Council (Heritage Lincolnshire)	August 2022	<p><u>Desk-based assessment</u>  Key guidance documents for the assessment are referenced in the PEIR, the Lincolnshire Archaeology Handbook (2019) is also required to inform good practice and methodology approaches for archaeological work undertaken in the county (as noted in previous comments).</p> <p>The PEIR references key data sources for the baseline data collation which includes some, but not all the sources expected to inform the desk-based assessment. It should include an aerial photographic assessment (including National Mapping Programme (NMP)) data and Portable Antiquities Scheme (PAS) data. LiDAR data has been noted in the list of sources (as previously recommended), however, the results of the LiDAR assessment are not included in the PEIR.</p> <p>A comprehensive suite of resources should be utilised for the compilation of the desk-based assessment which will inform the further stages of work required, including the intrusive investigations, to produce a full</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. Further information is available in Appendix 10.1 of the ES (document reference 6.3.10.1).</p> <p>The Applicant notes this comment.</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>description of the baseline conditions. Should further clarification be required, it is advised that the scope and methodology for the assessment be confirmed with the archaeological advisors (as noted in the Scoping Opinion).</p> <p>It is stated that the description of the baseline conditions provided in the PEIR ‘focusses primarily on the Energy Park Site and its environs; data gathering and analysis is ongoing for the off-site cable route and grid connection at Bicker Fen Substation’ (10.4.4.). Therefore the summary of the assessment results refers to the Energy Park only. The information appears to be drawn from the Historic Environment Record (HER) and other data sources as listed together with the summary results of the geophysical surveys; however, it does not include reference to or description of assessments of the LiDAR data or aerial photographs.</p> <p>No illustration of the search area, location and distribution of the identified heritage assets is included in the PEIR. A search area of 2km is noted for the HER data, however, it is not clear if this now includes the cable route options. An illustration is provided of the Designated Heritage Assets (Figure 10.1) within a 5km search area, however, this is focused on the Energy Park and does not include the cable route options and connection at the Bicker Fen Substation.</p> <p>The evidence base must include assessment of the whole Proposed Development area, including the ‘off-</p>	<p>The Applicant notes this comment. Further information is available in Appendix 10.1 of the ES (document reference 6.3.10.1).</p> <p>The Applicant notes this comment. The ES will provide an illustrate of the search area. This area includes the cable route options.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			site' cable route, to ensure that a proper assessment can made of the archaeological potential and the likely impacts on heritage assets to inform cable route selection, the scope of further surveys and development an appropriate mitigation strategy.	
Chapter 10, Cultural heritage	North Kesteven District Council (Heritage Lincolnshire)	August 2022	<p><u>Geophysical survey</u>  Geophysical survey has been carried out at the Energy Park, however, not all areas within the redline boundary for the Energy Park were included. A few geophysical anomalies recorded during the survey are referenced in the text description. The information is drawn from the Summary Report of Geophysical Survey Results (Appendix 10.1) which summarises the detail of four individual geophysical survey reports. There is a notable variation in presentation and interpretation of detail across the surveyed areas and few anomalies were interpreted as being of archaeological origin. Palaeochannels were recorded by the survey however, the archaeological potential of the roddons and the potential for palaeoenvironmental evidence in the fenland landscape have not been considered in the summary report.</p> <p>As noted in previous comments, recent archaeological investigations immediately adjacent to the proposed Energy Park identified significant remains of Iron Age and Roman period occupation, including evidence of salt-making. Geophysical survey in this area identified a number of anomalies interpreted as of possible archaeological origin, together with palaeochannels. Subsequent excavation revealed far more extensive</p>	<p>The Applicant notes this comment. The Order limits have since been reduced and trial trenching completed.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>archaeological remains of prehistoric and Roman date, notably on the roddons, than indicated by geophysical survey alone. Therefore, the potential for exploitation of slightly higher, drier land must be considered alongside the potential for palaeoenvironmental evidence when developing the programme of archaeological trial trenching.</p> <p>The geophysical survey has not been undertaken in some areas within the Energy Park, shown as potential 'Biodiversity Net Gain', in the southwest part of the redline boundary. It is noted that further information has been identified now which shows cropmarks of enclosures and other features in this area. If the 'BNG' areas are to be permanently excluded, with no construction activity or groundworks (including landscaping), then these areas should be defined and excluded / protected through all phases of the Proposed Development. If groundworks may be carried out in these areas then geophysical survey (followed by trial trenching) will be required to assess the archaeological potential and likely impacts. Clarification and appropriate mitigation or management measures should be provided in the Environmental Statement.</p> <p>The results of the full desk-based assessment, including the LiDAR and aerial photographic assessments, need to be collated with the geophysical survey results in order to design an appropriate programme of trial trenching to determine the presence, character, date and significance of archaeological remains. The PEIR</p>	<p>The Applicant notes this comment. The BNG area is no longer part of the Proposed Development and so no further survey work has taken place on this land. The order limits have been amended accordingly.</p> <p>The Applicant notes this comment. The Geophysical Survey results for the cable route area are</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>notes that the scope of the trial trenching is under discussion with the relevant stakeholders (10.4.22). An appropriate level of intrusive investigation will be required across the whole area of Proposed Development in order to provide an assessment of archaeological potential and inform the mitigation strategy.</p> <p>It is noted that the broad assessment area for the cable route contains remains of prehistoric and Roman occupation and recent archaeological excavation has revealed significant evidence of multiphase occupation, including enclosures, structures and industrial activity. A programme of geophysical survey will be required on the proposed cable route, and this, together with the results of the full desk-based assessment, will inform the development of the programme of trial trenching required.</p>	<p>included Appendix 10.4 (document reference 6.3.10.4)</p> <p>The Applicant notes this comment.</p>
Chapter 10, Cultural heritage	North Kesteven District Council (Heritage Lincolnshire)	August 2022	<p><u>Assessment of effects</u></p> <p>The assessment of baseline conditions and significance of identified archaeological remains given in the PEIR is incomplete. Therefore, the assessment of direct effects (truncation of archaeological remains) at construction and operation phases is limited to the assets as currently described and is incomplete. The likely significant effects (direct and indirect) will require reassessment in the light of further information from the next stages of work and the results of the trial trenching. Likewise the Summary of Effects, Mitigation and Residual Effects (Table 10.4) is limited to the</p>	<p>The Applicant notes this comment. Further detail is contained at Chapter 10 (document reference 6.1.10) and its associated appendices (document reference 6.3.10.1 – 6.3.10.4)</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>information recorded in the PEIR and will need to be revised in the light of further work.</p> <p>It is stated that the decommissioning phase of the Proposed Development ‘will have no direct physical effects on the archaeological resource.’ The extent and significance of the archaeological resource has not been fully assessed so the direct effects cannot be ascertained. It is considered that the decommissioning phase could impact on any archaeological remains identified during the EIA process. Therefore proposals for decommissioning should include consideration of the heritage assets (buried archaeological remains and built-heritage) and make provision for the protection / mitigation of remains that may be identified through the archaeological evaluation process.</p> <p>Paragraph 2.53.3 of the Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) (September 2021) notes .. the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation and states ‘These are expected to be carried out, using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.’</p>	<p>The Applicant notes this comment. The impacts of decommissioning are considered in Chapter 10 (document reference 6.1.10).</p> <p>The Applicant notes this comment.</p>
Chapter 10, Cultural heritage	North Kesteven District Council	August 2022	<p><u>Mitigation</u> The scope and nature of the archaeological mitigation will be informed by the desk-based assessments and</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
	(Heritage Lincolnshire)		archaeological field evaluations once complete. The mitigation strategy should include reference to the process of investigation, recording, and analysis and reporting culminating in publication and archive deposition, making the findings publicly accessible in accordance with the National Planning Policy Framework, national and local policy.	
Chapter 10, Cultural heritage	North Kesteven District Council (Heritage Lincolnshire)	August 2022	<p><u>Summary</u>  In summary, the information presented in the PEIR has addressed some points raised previously; other assessments or surveys and field investigations (trial trenching) have yet to be undertaken. However, and as stated in the PEIR, work is in progress including the assessment and analysis for the cable route options for the grid connection to the substation. The information from the ongoing and forthcoming archaeological surveys and investigations, including trial trenching, will be required to inform the assessment of likely significant effects and the mitigation measures to be presented in the Environmental Statement.</p> <p>The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.</p> <p>Therefore, the ES should provide a comprehensive desk-based assessment, non-intrusive surveys, and</p>	<p>The Applicant notes this comment. Further information is provided in the ES chapter, and the area for the cable route has been refined as outlined in the further (targeted) consultation.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation.</p> <p>In conclusion we would note that since the completion of the geophysical surveys (reported in the PEIR) proactive and ongoing discussions have been held with the archaeological advisors. The stages of work under discussion include the assessment and presentation of further information to develop an appropriate programme of trial [sic] trenching for the Energy Park and an assessment and geophysical survey of the cable route options.</p>	<p>Further details are provided in ES Chapter 10 (document reference 6.1.10).</p> <p>The Applicant notes this comment. They have since opted for cable route option A (name as per statutory consultation).</p>
Chapter 10, Cultural heritage	Lincolnshire County Council	6 September 2022	The following only summarises the comments provided by LCC's Historic Places Team. A full copy of their response is attached to this response and you are therefore advised to refer to that document for full details and comments on this Chapter of the PEIR.	The Applicant notes this comment. They have had regard to the full response provided by LCC's Historic Places Team (within this appendix).
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Standard archaeological practice for evaluation consisting of a competent desk-based evaluation followed by a reasonable and appropriate level of field evaluation by geophysical survey and trial trenching across the full impact zone is required to provide the baseline evidence required to identify the potential for buried archaeological remains which would be impacted by the proposed development. Much of the	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>ground impact of a solar farm is not archaeologically mitigatable and the depth of impact goes below any surviving archaeological levels, the archaeology which may be impacted cannot be archaeologically monitored or recorded during the groundworks.</p> <p>The Energy Park and the cable route have not been investigated and the development impact area has not yet been evaluated by the full suite of standard field investigation techniques. The potential is unknown and if value must be placed then it should be very high until sufficient evaluation has been undertaken to provide evidence of its presence or absence. The Cultural Heritage chapter has not been transparent in clarifying that this entire section and all value judgements made in it are based on partial results with most of the archaeological evaluation phases still to come. It is important to be clear that such an incomplete data set is itself of very limited value and any conclusions drawn from it are provisional at best.</p>	The Applicant notes this comment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	The next statement is also erroneous and misleading: "Mitigation by design may be required with regard to non-physical effects upon designated heritage assets arising from the construction and operation of the Energy Park. The residual effects are not anticipated to be significant" (10.1.3) Assessment has not been undertaken, again there is no basis for such a statement.	The Applicant notes this comment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Regarding the Data sources section (10.3.5), several of the websites listed prohibit the reproduction of maps without specific license, evidence of copyright	The Applicant notes this comment. Further details are



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>permission will need to be provided. We expect a full competent complete desk-based assessment including Portable Antiquities Scheme (PAS) data, local sources and non-map material held by the Lincolnshire Archives. Map regression of the full impact zone is required which should include all available maps to provide a reasonable understanding of the development and time depth of the site. The Lincolnshire Archaeology Handbook is also required to inform good practice and methodology approaches for archaeological work undertaken in this county.</p> <p>No aerial photography sources are listed in the Data sources (10.3.5). We expect a full competent LiDAR and air photo analysis including interpretation and assessment informed by full aerial photo coverage using all available oblique and vertical air photos including the Historic England Archive and Cambridge University Collection of Air Photos as well as RAF and Ordnance Survey photos including those held by Lincolnshire County Council.</p> <p>We would also like to note that we are extremely disappointed that neither the desk-based assessment nor the air photograph/LiDAR assessment have been produced in a timely fashion. Submission of these documents after any agreed trenching plan will necessitate further trenching as necessary where new evidence or indications of archaeological potential are identified in these documents.</p>	<p>provided in Chapter 10 of the ES (document reference 6.1.10).</p> <p>The Applicant notes this comment. LiDAR imagery is provided in the ES documentation at Appendix 10.1 (document reference 6.3.10.1).</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	<p>Section 10.3.21 states that settings assessments were undertaken and this work is still in progress. The Settings Assessment needs to begin from an understanding of the significance of each of those assets in order to assess the potential impact of the development on them and put forward any potential benefit or mitigation of proposed negative impact. Any application of approach must be informed by a competent assessment of significance, and with the proposed lifespan of the development spanning 40 years and beyond, the potential visual, kinetic and experience impacts on each heritage receptor and its significance, on how they relate to each other and the landscape in which they sit must all be assessed and understood. Any proposal to descope designated or relevant non-designated assets must be informed by a competent informed evidence base demonstrating the lack of direct or indirect impact upon the heritage asset and its significance before it can be descoped.</p> <p>Scoping Criteria (10.3.47) considers only demolition or truncation as potential physical direct effects of construction or decommissioning. There is also the potential construction impacts of compaction, machine tracking and reduction of protective depths of soil, as well as the potential effects on the moisture levels and chemical composition of the soils all of which may have an impact upon surviving archaeology. Any proposed mitigation measures such as landscaping, tree planting or habitat construction would also lead to potential impacts on surviving archaeology and settings impacts.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	The Limitations to the Assessment point out that “the conclusions presented within this chapter are based upon the baseline conditions which are derived in large part from the data held and supplied by the Lincolnshire HER.” (10.3.48) This is a very important point as it shows there is insufficient evidence as the basis for all the statements throughout the document which claim there will be no significant archaeology or that the development’s impact upon surviving archaeology would not be significant. No site specific fieldwork has been undertaken to determine the archaeological potential across the impact zone, and the proposed impacts of the development would go below the levels of any surviving archaeology.	The Applicant notes this comment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	There is no reference to the cable route in the baseline survey information (10.4.4 to 10.4.17).	The Applicant notes this comment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.4.21 states that based on currently available information none of the potential archaeological remains “would be considered heritage assets of the highest significance and as such non are anticipated to require preservation in situ.’ If preservation in situ is not an option for this development then all archaeology which may be impacted by the development will need to be preserved by record. Reasonable and appropriate mitigation will obviously include the full suite of archaeological fieldwork mitigation solutions particularly archaeological strip map and record (SMR) and set piece excavation (SPE) to deal with the development impact in accordance with standard archaeological good practice. Following	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			sufficient field investigation including geophysical survey and a full programme of trial trenching across the impact zone including the proposed cable route a robust competent mitigation strategy will need to be submitted with the DCO submission and strictly adhered to post consent as part of the works programme.	
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.5.4 states that “Given their finite nature the direct development effects upon the known and potential buried archaeological resource would be direct, long-term, permanent and adverse, but not significant.” We do not agree in the strongest possible terms. How can the impacts be ‘not significant’ when all the impacts listed in 10.5.1 – 10.5.3 are below the depth of any surviving archaeology and 10.5.3 clearly states that construction activities would truncate and/or remove known and potential buried remains? Please clarify.	The Applicant notes this comment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	There are references throughout the chapter on the potential significance of currently surviving archaeological deposits which will be impacted by the proposed development; this section and other references claim unknown unevaluated potential archaeology is not significant or highly significant. Does this mean that there is some sort of cut-off point where archaeological value means it is not important enough to require mitigation? In our opinion a site which has local or regional rather than national or international significance which would be wholly or partly lost by development impact would still require mitigation. This is in accordance with NPPF which states that ‘Local	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact' (s 205).	
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.5.6 states the decommissioning phases will have no direct physical effects on the archaeological resource. We do not agree. Impacts from decommissioning must be assessed and mitigated at this stage as it cannot be adequately undertaken during demolition work in 40 years' time.	The Applicant notes this comment. The Heritage Chapter of the ES (Chapter 10) has considered the decommissioning implications of the development on heritage assets.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.6.3 states that "further archaeological work may be required pre-commencement to record certain archaeological remains prior to their truncation and/or destruction through construction of the Proposed Development." In accordance with EIA Regulations sufficient evaluation work is required to inform the mitigation strategy which is to be submitted with the DCO submission. This will require enough information on the presence, extent, depth and significance of archaeology across the full extent of the impact zone including the cable route. Given that in 10.4.21 states there will be no preservation in situ once the mitigation areas are identified and the extents are determined with corresponding appropriate levels of mitigation to inform the strategy, all mitigation works across the site will need to be completed before commencement of any groundworks except in those cases where	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			monitoring during groundworks is appropriate to the nature of the archaeology and the proposed impact upon it.	
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.6.4 states that ‘No enhancements are currently anticipated to result from the proposed development in respect of cultural heritage.’ This is erroneous and will not be the case. A full suite of community outreach and public engagement will be required as an important and intrinsic part of the requirements for the archaeological programme of works. Archaeology and cultural heritage can add immense value to a large development project.	The Applicant notes this comment. The enhancements that are being proposed from this development are outlined in the heritage chapter of the ES.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	The Summary Introduction states that “This chapter has considered potential effects upon the significance of cultural heritage receptors. Buried archaeological remains, earthworks, buildings/structures and all other aspects of the historic environment have all been considered.” (10.8.1) We do not agree.	The Applicant notes this comment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.8.3 lists “known and potential non-designated heritage assets” This is untrue. It lists only known non-designated heritage assets in the Energy Park which are in the Lincolnshire HER. We stress again the necessity for the completion of a full competent desk-based assessment and programme of evaluation trenching across the full impact zone and to inform an appropriate mitigation strategy in the ES Chapter.	The Applicant notes this comment. Trenching assessment has taken place over the Energy Park site in accordance with methodology agreed with LCC.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.8.4 states “There is currently nothing to suggest that these buried remains are or would be of the highest heritage significance” Please clarify whether this implies that only archaeology of the ‘highest heritage significance’ is proposed to be dealt	The trenching work that has taken place on site found some buried remains. The details of these have

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			with, presumably this would be a Unesco World Heritage Site. This would be contrary to all current guidance and archaeological best practice and we strongly reject this statement.	been shared with LCC and considered within the ES (Chapter 10).
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	As stated above we fundamentally disagree with all such statements in this PEIR chapter. Full reasonable and appropriate levels of evaluation fieldwork is required before the potential for buried archaeological remains can be identified. As for the repeated references to value judgements regarding highest significance: does this section mean that there is some sort of cut-off point where archaeological value means it is not important enough to require mitigation? As discussed above, this is not acceptable and contrary to NPPF and all relevant guidance.	The Applicant notes this comment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	<p>Section 10.8.4 also states “the need for and timing and scope of further archaeological investigations to clarify this will be negotiated and agreed through forthcoming negotiations.” We have agreed that a full trenching programme is required and we await a suitable trenching evaluation Written Scheme of Investigation prior to the commencement of intrusive evaluation fieldwork.</p> <p>Trenching results are essential for effective risk management and to inform programme scheduling and budget management. Failing to do so could lead to</p>	<p>The Applicant notes this comment. Results from trail trenching on the Energy Park site have been submitted to LCC for consideration. The DCO application includes WSI for Energy Park and Cable Grid Route Corridor.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided. A programme of trial trenching is required to inform a robust mitigation strategy which will need to be agreed by the time the Environmental Statement is produced and submitted with the DCO application.</p> <p>Trial trenching is required not only across known or suspected archaeology to determine their presence or absence, depth, extent and significance but also across the 'blank' areas to obtain baseline evidence where previous evaluation techniques have not identified archaeological remains. This is required to get a full understanding of the archaeology which will be impacted across the full impact zone and will inform the archaeological mitigation strategy which must be undertaken as part of the EIA.</p>	<p>The Applicant notes this comment.</p>
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.8.6 states that "No significant effects have been identified through the assessment work undertaken to date. This includes direct effects as a result of truncation or destruction of buried archaeological remains, and indirect effects as a result of changes to setting." Again this is misleading and unhelpful, there is no evidence to support such statements based on what the chapter itself (10.3.48) states is little more than an HER search.	The Applicant notes this comment. The ES includes and assesses the findings of the trial trenching that has taken place on the Energy Park site.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.8.7 states that "At this stage, no mitigation through design is considered necessary for archaeology but planting may be necessary to screen the Energy Park." The immediate and future potential impacts of	The Applicant notes this comment.



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			planting and landscaping will need to be investigated and understood with a detailed competent basis of site specific information on the extent, depth and significance of any surviving archaeology which may be impacted. The potential impact of the proposed mitigation on historic settings also needs to be determined and this must be informed by the significance of each heritage asset and any inter-relationships which may be effected by the proposed mitigation.	
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.8.8 states that “Mitigation may be required pre-commencement to counter the impacts of construction activities upon the known and potential buried archaeological resource of the Energy Park site.” As previously stated, all mitigation work will need to be completed prior to commencement other than in areas where monitoring is agreed as part of an appropriate mitigation strategy.	The Applicant notes this comment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	Section 10.8.8 goes on to state that “This may also be required along the off-site cable route but the geophysical survey of this route is proposed after the 2022 harvest. Once this data has been gathered the need for mitigation can be assessed further.” The full potential impact zone including all proposed connection corridors as well as the main development site will need to undertake sufficient evaluation to allow for a programme of suitable mitigation. The full extent of the proposed impact area including the connector route corridors must be included in the evaluation process as archaeological impacts and subsequent mitigation have the potential for significant	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			financial and scheduling impacts. The full potential impact zone will require geophysical survey and trial trenching to identify site-specific archaeological potential and subsequent mitigation.'	
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	The Conclusion states that "This chapter has identified no significant effects in respect of cultural heritage assets (above and below ground) that would arise from a development of the nature and on the scale proposed." (10.8.9) We do not agree. To make such a statement as a conclusion without acknowledging the paucity of baseline evidence is woefully inadequate at best.	The Applicant notes this comment. Since the PEIR was drafted considerable further survey work has taken place on the land within the Order Limits. This survey work is now part of the baseline data for the heritage assessment.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	We do not agree with any of Table 10.4 which dismisses even permanent impact upon even a "Designated heritage asset of the highest significance" as "Not significant."	The Applicant notes this comment. The ES has considered the impacts on the Designated Heritage Assets within the assessment area around the Proposed Development.
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	In conclusion, the EIA will require the full suite of comprehensive desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an	The Applicant notes this comment. Since the PEIR was drafted considerable further survey work has taken place on the

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.</p>	<p>land within the Order Limits. This survey work is now part of the baseline data for the heritage assessment.</p>
Chapter 10, Cultural heritage	Lincolnshire County Council (Historic Places Team)	6 September 2022	<p>The EIA will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains.</p> <p>This is in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states "The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape." (Regulation 5 (2d))</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 11, Socio-economics	North Kesteven District Council	1 September 2022	<p>We make some general comments regarding the Business Rates calculation and also query whether decommissioning and the cumulative operational phase effects are 'significant' in EIA terms.</p>	<p>The Applicant notes this comment.</p>
Chapter 11, Socio-economics	North Kesteven District Council	1 September 2022	<p><u>11.7.2</u></p>	

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>Paragraph 11.7.2 states that the significance of the cumulative operational phase effects (for the Proposed Development and cumulative solar schemes listed in 11.7.1) has been assessed as moderate beneficial, which is significant in EIA terms. This takes into account the labour market in North Kesteven District Council and the level of job creation. However, this conclusion is drawn taking into account the 4 NSIP solar schemes that are located outside the District and where the impacts on job creation and the labour market within the District itself are unclear. It is likely that West Lindsey and Bassetlaw DC's will seek to promote job creation/contract awarding arising from these schemes within their own Authority areas and as such the degree of positive socio-economic impact within NKDC is at best unknown at this stage.</p> <p>Business rates from these schemes would not benefit NKDC and if pro-rata operational and decommissioning job creation figures are assumed for those NSIPs (based on an estimated 12 jobs in North Kesteven and in the wider economy that would be supported by Heckington Fen) then the cumulative job creation/support impacts are unlikely to be cumulatively 'significant' in that geographical context during the operational phase of the development. Even if significant cumulative construction effects were assumed these would only be temporary.</p>	<p>The Applicant notes this comment. The ES Socio Economic chapter assesses the jobs created during construction and operation from this Proposed Development.</p> <p>The Applicant notes this comment.</p>
Chapter 11, Socio-economics	North Kesteven District Council	1 September 2022	<p><u>General comments</u> In terms of jobs creation, the section read contains some potentially contradictory details which should be</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>clarified. Chapter 11 states that in the construction period, which will last 18 months, that up to 100 construction workers would be on site at peak construction time. However, elsewhere in the document, it states that the construction phase will deliver 67 jobs. There is no explanation, that we can see, as to why these figures differ. It may be that this is the average over the period, but if that is the case, that needs explaining and calculation provided.</p> <p>In addition, in relation to NNDR (business rates) income the section notes that the development will pay £1.3 million per annum in rates, which it then says will be a payment of £28.8 million over the 40 year lifespan of the scheme. These figures do not align – should the figure be circa £52m?</p> <p>In relation to other matters, the implication in the PEIR is that because of the technical nature of the solar panels and installation, that the construction companies involved will be bringing in their own labour primarily with potentially reduced opportunity for local employment in the construction phase. However it is not explicitly stated. It would therefore be helpful if this chapter of the ES can set out how the construction element of the contract will be serviced; and what the scope is for the use of ‘local’ (perhaps taken to be District-wide?) labour in certain elements of the works programme. In addition the ES should confirm whether there are opportunities for any apprenticeships for local people. Some of the less specialised</p>	<p>Further assessment has determined that the construction programme could take up to 30 months. The assessments in the ES have considered these amended timescales.</p> <p>The numbers are calculated on present value rather than on a multiplication per annum.</p> <p>The Applicant notes this comment. They aim to use local contractors wherever possible. They have already engaged with local firms to this end. An outline Supply Chain, Employment and Skills Plan is included in the application documentation at 7.12.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>groundworks/infrastructure works appears to be fairly standard in nature so there appears to be sufficient opportunity to utilise at least some locally based contractors.</p> <p>The Chapter also states that there will subsequently be 5 FTE permanent positions that operate and maintain the scheme. Will these posts cover all conceivable maintenance on the scheme, or will there be the opportunity for some local servicing and maintenance contracts? If so, the ES should set out what these opportunities are and what trades might be involved. The Council also considers that further thought could be given to community outreach and public engagement events; for example in relation to the required archaeological programme of works, in order to help local communities better understand and engage with the development.</p> <p>Additionally, whilst it is noted efforts to address wider community benefits will be undertaken outside of the DCO process (paragraph 11.8.11 refers) there are several similar such NSIP projects being promoted within the County that are to be delivered over a similar timescale. Opportunities should therefore be explored to help upskill and support local residents so that they can be ready to access the job opportunities that would be created by this development (as well as the other proposed solar NSIP projects) and to enable local suppliers to access contracts.</p>	<p>An outline Supply Chain, Employment and Skills Plan is included in the application documentation at 7.12.</p> <p>The Applicant notes this comment. They will explore opportunities to help upskill and support local residents. They also aim to use local suppliers wherever possible. An outline Supply Chain, Employment and</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				Skills Plan is included in the application documentation at 7.12.
Chapter 11, Socio-economics	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• Paragraph 11.5.11 - it is estimated that once operational and fully occupied, the additional GVA supported by the Proposed Development is estimated to be around £625,800 per annum, allowing for multiplier effects. Over the 40-year operational lifespan of the solar farm the GVA generated is estimated to be around £13.9million (present value). Information should be presented within the ES that shows the economic impact that the solar development would have on the income of the landowner. A comparison should be made between the income that would be lost as a result of the land being taken out of intensive arable production and how this compares to that which would be received from the solar development and low-density sheep grazing which would replace it - whether this be positive or negative.</li> </ul>	The Applicant notes this comment. The details of the income to the landowner are not provided due to commercial sensitivities.
Chapter 11, Socio-economics	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• There are local impacts felt by communities hosting NSIPs and so consideration should be given to the provision of community benefits and legacy opportunities other than just improved access to the public rights of way network and the Community Orchard as proposed. For example, consideration should be given to community outreach and public engagement events as part of the archaeological programme of works in order to help local communities better understand the archaeology and the historic past of their local area. Additionally, whilst it is noted</li> </ul>	The Applicant notes this comment. They are considering the provision of a community benefit fund, which would be outside of the DCO application process. Any such fund would need to be aligned with Ecotricity's

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>efforts to address wider community benefits will be undertaken outside the DCO process (paragraph 11.8.11) there are several similar such NSIP projects being promoted within the County that are to be delivered over a similar timescale. Opportunities should therefore be explored to help upskill and support local residents so that they can be ready to access the job opportunities that would be created by this development (as well as the other projects) and to enable local suppliers to access contracts. Other NSIP promoters have therefore proposed the submission of an Outline Skills, Supply Chain and Employment Plan as part of the DCO which would look at what actions could be taken and a similar approach for this scheme is therefore encouraged and would be supported.</p>	<p>mission – to end the use of fossil fuels and tackle the climate crisis. They also aim to use local suppliers wherever possible. An outline Supply Chain, Employment and Skills Plan is included in the application documentation at 7.12.</p>
Chapter 12, Noise and vibration	Boston Borough Council	25 August 2022	<p>cumulative effects of the cabling works of several other local schemes proposed at Temple Oaks, Folkingham and Bicker Solar Farm should be taken into account as these schemes also propose cabling works to connect to National Grid at Bicker. The potential for cumulative impacts on residential amenity, the environment and heritage assets should be taken into account, along with any proposed mitigation in relation to traffic movements, dust and noise impacts, especially during construction phases.</p>	<p>The Applicant notes this comment. Cumulative effects are considered within the relevant chapters where relevant.</p>
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<p>Table 12.4 contains derived background, predicted rated noise levels (dB) and BS 4142 assessment at key receptors. Of note are that Ashley House and Catlins Farm are expected to experience +Bdb above background daytime and +13db/+15db night-time noise levels. 12.5.19 notes that there is a potential for a</p>	<p>The Applicant notes this comment.</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>medium to high magnitude of change due to operational noise on some highly sensitive receptors under worst-case assumptions and in the absence of any mitigation. This corresponds to moderate to major adverse noise effects which would therefore be significant.</p> <p>It should be confirmed through the ES whether a 3m high solid noise barrier is essential to mitigate noise impacts; the PEIR suggests that a 3m high solid noise barrier as an integral part of the design has been considered but subsequently discounted.</p> <p>Subject to the above comment, the supporting text to table 12.6 notes that the resulting assessment of residual effects of operational noise, in all cases, are minor or negligible adverse which is not significant. However Catlins Farm is predicted to experience +6db night time noise levels after mitigation and where levels above +5db are indicative of where complaints are more likely.</p>	<p>A high solid noise barrier is not essential to mitigate noise impacts.</p> <p>The Applicant notes this comment.</p>
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<p><u>12.3.8 and table 12.1</u></p> <p>The location of the proposed areas of trenchless night time construction should be identified. Table 12.1 states noise levels on the basis that 'this assumes construction during weekday day-time or Saturday mornings for a sustained period of 1 month or more. For sustained works during evening, Sundays, Bank Holidays or Saturday afternoons, the criteria would be reduced by 10dB, and for night-time works by 20dB'. The ES should clarify why and how the 1 week/1 month</p>	<p>The Applicant notes this comment. The ES will clarify why and how the durations have been specified. It will also give these examples and likely noise levels.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			works durations have been specified. Furthermore it should also explain and give examples of what 'sustained' works relates to in relation to the duration of works and likely noise levels.	
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>Table 12.2</u> Tables 12.1 and 12.2 provide different db levels for construction and operational noise significance; the 'high' effect magnitude for construction assumes +5db above background, whereas for operational noise it assumes +10db above background. The ES will need to set out why different thresholds have been adopted.	The Applicant notes this comment. The ES will set out why they have adopted different thresholds.
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>12.5.5</u> The ES should explain how the 1 month period has been derived in relation to the overall conclusion of negligible effect	The Applicant notes this comment. The ES will explain this.
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>12.5.6</u> Are there any specific considerations in relation to ASD or hypersensitivity to noise stemming from the proximity of Elm Grange school to the proposed works and which need to be factored into the noise assessment? Has contact been made with Elm Grange School to establish whether any pupils are likely to display heightened sensitivity to noise and whether/how this has been accounted for through any corrections or adjustments the construction and operational noise impacts?	The Applicant will engage with Elm Grange School on this issue. It should be noted that in the ES this school is called 'Build a Future East Heckington'. This name was requested by the school in our consultation with them.
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>12.5.8</u> The locations of proposed HDD drilling should be specified in the ES along with details of whether any	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			mitigation possible is possible to reduce the anticipated major temporary adverse effect which is 'significant'.	
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>12.5.15</u> For operational noise it is assumed that the noise assessment has adopted the indicative layout with a single BESS facility as shown on that plan, along with the disposition of the 132kv and 400kv substations	The Applicant notes this comment.
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>12.5.17</u> The ES should explain how the +4db tonal penalty has been adopted	The Applicant notes this comment. The ES has explained this.
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>Table 12.4 and 12.5.19</u> Table 12.4 contains derived background, predicted rated noise levels (dB) and BS 4142 assessment at key receptors. Of note are that Ashley House and Catlins Farm are expected to experience +8db above background daytime and +13db/+15db night-time noise levels. 12.5.19 notes that there is a potential for a medium to high magnitude of change due to operational noise on some highly sensitive receptors under worst-case assumptions and in the absence of any mitigation. This corresponds to moderate to major adverse noise effects which would therefore be significant.	The Applicant notes this comment.
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>12.6.7</u> Please can estimates be provided as to what the 'shortest practical timescale' is, along with identifying the locations of the probable HDD/trenchless works	The Applicant notes this comment. They will provide these estimates and locations.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<p><u>Table 12.5, paragraphs 12.6.14 and 12.6.15</u>  Paragraph 12.6.14 confirms that the noise level maxima in table 12.5 are achievable in practice through a number of measures including placement of the potentially noisiest sources (such as central inverters, if used) to maximise distance to noisesensitive receptors and the use of dedicated noise-reducing enclosures or suitably placed solid screening (through dedicated solid barriers or using buildings/containers). Paragraph 12.6.15 then states that ‘to illustrate that the noise limits outlined in Table 12.5 are achievable through design mitigation and selection of suitable generation equipment, Appendix 12.2 sets out the results of noise modelling if a 3m high solid noise barrier enclosing the east, south and west edges of the energy storage area was included in the Energy Park design’. Continuing the paragraph states that ‘in addition to this, it was assumed that a further 6 dB reduction in plant noise levels would be achieved through some of the other measures outlined in the above paragraph’.</p> <p>However, the paragraph then notes that ‘for clarification, the Energy Park Layout that has been considered within this PEIR does not have the 3m high solid noise barrier within the design’.</p> <p>It should be confirmed through the ES whether a 3m high solid noise barrier is essential to mitigate noise impacts. The above reference suggests that a 3m high solid noise barrier as an integral part of the design has been considered but subsequently discounted? If this is</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>A high solid noise barrier is not essential to mitigate noise impacts.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			the case there should be a detailed rationale provided. In the consideration of 'alternatives' the ES should also describe how the suggestion of the 'placement of the potentially noisiest sources (such as central inverters, if used) to maximise distance to noise-sensitive receptors' has been considered within the site layout and configuration.	
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>Table 12.6</u> The supporting text to table 12.6 notes that the resulting assessment of residual effects of operational noise, in all cases, are minor or negligible adverse which is not significant. However Catlins Farm is predicted to experience +6db night time noise levels after mitigation and where levels above +5db are indicative of where complaints are more likely.	The Applicant notes this comment.
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>Hoare Lee Appendix 12.2</u> Table 12.2.10. and 12.2.11 set out various assumptions with a 3m high barrier and other noise reduction measures, however as above chapter 12 of the PEIR suggests that no noise barrier is proposed. Although noise estimates do not include the screening effects of the panels around the BESS (the noise attenuating effects of which should be detailed the ES) the Hoare Lea report doesn't then advise what the 'other noise reduction measures' are and if this includes the role of the panels for sound reduction, and what % or amount of mitigation is provided by the panels.	The Applicant notes this comment. The ES will provide additional information on noise reduction measures should they be required.
Chapter 12, Noise and vibration	North Kesteven District Council	1 September 2022	<u>General comment</u> It is notable that the location/size of the energy storage area used in the noise modelling appears to reflect that shown on Figure 3.2 and not that on Figure 4.1d which	The Applicant notes this comment. They provided additional

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>is much larger. On that basis it is not clear whether the noise modelling carried out so far represents a possible 'worse case' given a potentially much larger battery storage area is shown on Figure 4.1d which means that elements of this could be closer to the noise sensitive properties currently assessed. The potential impacts of any such barrier would also need to be taken into consideration in assessing other impacts/topics of the ES, for example, such as the LVIA.</p>	<p>information on the energy storage area in the further (targeted) consultation, stating that it has been moved further away from properties around the site and closer to the central farm buildings.</p>
Chapter 12, Noise and vibration	Lincolnshire County Council	6 September 2022	<p>LCC does not have an in-house noise specialist however the following comments are offered at this stage. We also recommend and endorse any recommendations or comments made by North Kesteven District Council and Boston Borough Council on this particular topic.</p> <ul style="list-style-type: none"> <li>• Table 12.4 confirms that (without mitigation) some noise-sensitive properties located to the east and south of the proposed energy storage area would experience noise levels higher than the existing typical background noise especially during the quieter night-time period (as a high as +15dB in some cases). The noise modelling carried out as part of the PEIR identifies the location of the energy storage area and assumes a 3m high solid noise barrier would be present around the east, south and west edge. However, paragraph 12.6.15 of the PEIR confirms no such barrier is currently considered within the PEIR and it is notable that the location/size of the energy storage area used in the noise modelling appears to reflect that shown on Figure 3.2 and not</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>that on Figure 4.1d which is much larger (see earlier comments).</p> <ul style="list-style-type: none"> <li>Given the above, at this stage, it is not clear if a 3m high barrier is proposed; if it is, what form this would take (i.e. earth bund or solid fencing) or whether the noise modelling carried out so far does truly represent a possible 'worse case' given a potentially much larger battery storage area is shown on Figure 4.1d which means that elements of this could be closer to the noise sensitive properties currently assessed. This therefore needs to be clarified with the correct site layout plan used as part of the noise modelling and, if a barrier is being proposed and promoted as suitable mitigation to ensure noise levels from the development can be appropriately reduced, then full details of this should be shown and included within the site layout and assessed as part of the final ES. This will be necessary to ensure the benefits that are predicted are realistic and deliverable. The potential impacts of any such barrier would also need to be taken into consideration in assessing other impacts/topics of the ES, for example, such as the LVIA.</li> <li>LCC therefore invites you to clarify whether a 3m barrier is proposed and if so, what form this would take. You are also requested to ensure that the impacts of this barrier are reflected in other sections/topics of the ES and shown on the final design layout plans in order to ensure that noise assessment and modelling</li> </ul>	<p>The Applicant notes this comment. A 3m high solid barrier is not proposed, as it is not essential to mitigate noise impacts. The Applicant provided additional information on the energy storage area in the further (targeted) consultation, stating that it has been moved further away from properties around the site and closer to the central farm buildings.</p> <p>A 3m high solid barrier is not proposed, as it is not essential to mitigate noise impacts.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			carried out is accurate and truly reflective of the development proposed.	
Chapter 13, Climate change	North Kesteven District Council	1 September 2022	<p>The PEIR refers to the approach of assessing embedded carbon (construction/component delivery/commissioning etc)and overall energy production. Paragraph 13.3.23 notes that efficiency losses of the PV modules over time have been accounted for based on an assumed industry benchmark degradation factor for each subsequent year.</p> <p>However it is unclear whether assumptions on embedded carbon make allowances for the degradation and requirements to replace batteries in the BESS. Estimates regarding embedded carbon should therefore include for the replacement of batteries as well as panels and it would be helpful if the ES could present a timeline across the 40-year operational period by which energy generation carbon savings are expected to exceed carbon embedded in the scheme construction, with an allowance for component replacement.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The ES chapter considers the carbon implications of the Proposed Development including the use of batteries within Energy Storage.</p>
Chapter 13, Climate change	North Kesteven District Council	1 September 2022	<p><u>13.3.18 to 13.3.20 and 13.3.23</u>  These paragraphs refer to the approach of assessing embedded carbon (construction/component delivery/commissioning etc) and overall energy production. 13.3.23 notes that efficiency losses of the PV modules over time have been accounted for based on an assumed industry benchmark degradation factor for each subsequent year. However, it is unclear whether assumptions on embedded carbon make</p>	<p>The Applicant notes this comment. The ES chapter considers the carbon implications of the Proposed Development including the use of</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			allowances for the degradation and requirements to replace batteries in the BESS. Estimates regarding embedded carbon should therefore include for the replacement of batteries as well as panels and it would be helpful if the ES could present a timeline across the 40 year operational period by which energy generation carbon savings are expected to exceed carbon embedded in scheme construction	batteries within Energy Storage.
Chapter 13, Climate change	North Kesteven District Council	1 September 2022	<u>13.3.56 to 13.3.58</u> The total GHG emissions from the construction phase are estimated to equate to 370,000 tCO <sub>2</sub> e and the annualised total annual construction emissions equate to 247,000 tCO <sub>2</sub> e or 0.063% of the UK carbon budget. To confirm whether these figures are added together (i.e embodied + construction = 617,000 tCO <sub>2</sub> e?)	The Applicant notes this comment. The GHG figures for the assessed scheme are included in the ES.
Chapter 13, Climate change	North Kesteven District Council	1 September 2022	<u>13.3.66</u> Does the GHG avoidance figure assume the allowance for embodied carbon i.e is the 'avoidance' figure the 'net' figure taking account of embodied carbon in materials, transport and construction and operational GHG emissions (40 years) vs the saving through the equivalent amount of electricity generation over the operational lifetime of the Energy Park from the projected grid energy mix?	The GHG avoidance accounts for embodied carbon.
Chapter 13, Climate change	North Kesteven District Council	1 September 2022	<u>13.3.72</u> As above, a clear calculation of the overall net figure (with diagram to assist) and the component GHG elements would be helpful	The Applicant notes this comment. The ES will provide this calculation.
Chapter 13, Climate change	Lincolnshire County Council	6 September 2022	The following comments and questions have been provided by consultants appointed by LCC who have	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			reviewed the predicted GHG emissions and emissions saving of the development.	
Chapter 13, Climate change	Lincolnshire County Council	6 September 2022	<p><u>Analysis of Plant's Energy Output</u>  A comparison with other solar assessment tools shows a good correlation with the scheme's expected annual energy output. The Solar Park sits on 586ha of land with an expected output power of 400MW. The land allocated therefore falls short of the standard recommended requirement of 2ha for every 1 MW of PV size.</p> <p>1. Solar PV site allocated space falls below the recommended sizing (2ha to 1MW). How will panels be packed into the space without affecting the output energy yield?</p>	<p>The Applicant notes this comment. Spacing may vary across the Energy Park site depending on size of each field and is subject to change with advancements in technology. Two hectares (ha) to 1MW could be considered a rule of thumb before work is commenced on site design. Specialist teams have inputted into the layout of the Energy Park and the 524ha Energy Park is considered suitable for around 500MW DC/400MW AC of solar panels.</p>
Chapter 13, Climate change	Lincolnshire County Council	6 September 2022	<p><u>Analysis of BESS Unit</u>  "There is the potential for further energy storage area to be located near to the 132kV substations which are located across the Site. It is estimated at this time that</p>	<p>The applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>the storage capacity of this site would be approximately 200- 400MW. A maximum of 6.04 ha is set aside for this element of the Energy Park Development, with a maximum height of 6m The Primary Energy Storage Area is 2.8ha".  Battery capacity has been provided in the PEIR document, having a compound area for the Primary Battery Park at 2.8ha. Assuming C1 discharge rate for the BESS units, the allocation of land size does not equate to the number of battery cabins that can be installed. For instance, GE's 1MW RSU Mid Power BESS Unit1 occupies 32m2 . This implies that the Primary Battery storage area could accommodate over 400MW of installed BESS capacity at only 50% utilisation of the allocated land (see Fig 2).</p> <p>1. Primary land allocated could accommodate more than the stated high estimate of BESS storage of 400MW. Are there plans for expanding the BESS storage in the future?</p> <p>2. How will the batteries be decommissioned, considering they will be replaced several times over the plant's lifespan?</p>	<p>Replacement of batteries are considered in Chapter 13 of the ES (document reference 6.1.13).</p>
Chapter 13, Climate change	Lincolnshire County Council	6 September 2022	<p><u>Analysis of GHG emissions Paragraph 13.3.61</u> - The most significant GHG emissions during the operational phase are estimated to result from maintenance activities associated with embodied carbon and the transport of replacement parts and equipment, which account for 79.14% of the total emissions. Paragraph</p>	<p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>13.3.62 - Total operational GHG emissions are estimated to equate to 93,200 tCO<sub>2</sub>e over the 40-year design life, as presented in Table 13.8 below. On an average annualised basis, this is equivalent to 2,330 tCO<sub>2</sub>e per year of operation..."</p> <p>'Maintenance' has the highest % of operational GHG emissions with a value of 73,800 tCO<sub>2</sub>e (Table 13.8). Assuming lithium-ion batteries are adopted in the scheme, given their lifespan, at least two replacements are expected over the 40-year operational lifespan. The BESS alone can thus account for over 80% of the emissions figure allocated to 'maintenance'. This does not seem to represent the worst-case scenario during the operational phase, as highlighted in the PEIR.</p> <p>1. Operational emissions seem underestimated as BESS replacements alone could potentially amount to the total maintenance emissions. Please can you clarify?</p> <p>2. What replacement rates are considered for the main products of the plant?</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The climate change chapter of the ES has considered the ESS emissions and replacement rates.</p>
Chapter 13, Climate change	Lincolnshire County Council	6 September 2022	<p><u>Analysis of Grid Decarbonisation</u></p> <p>The UK's grid has witnessed gradual decarbonisation over the years, with 60% decarbonisation achieved in 10 years (between 2009 and 2109). The scheme adopts grid decarbonisation.</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>Paragraph 13.3.45 – “Therefore, the GHG intensity of the Energy Park (defined as the operational emissions divided by the energy generation) has been compared with both the forecasted 2022 GHG intensity of the electricity grid (136gCO<sub>2</sub>e/kilowatt-hour (kWh)), as well as the projected grid GHG intensity as published by BEIS (BEIS, 2021) over the operational phase of the Energy Park.”</p> <p>Paragraph 13.3.67 – “Based on the difference between the operational GHG emissions of the Energy Park, 93,300 tCO<sub>2</sub>e as shown above in Table 13.8, and the estimated emissions that would result from sourcing the equivalent energy supply from the grid, 232,000 tCO<sub>2</sub>e, (BEIS, 2021), it is therefore estimated that the Energy Park would result in avoided GHG emissions of 138,000 tCO<sub>2</sub>e”.</p> <p>It is mentioned that the forecasted grid GHG intensity is from BEIS 2021. The source cannot be found as the last updated projection was for BEIS 2020, and only a partial update was provided for 2021 [https://www.gov.uk/government/publications/energy-and-emissionsprojections-net-zero-strategy-baseline-partial-interim-update-december-2021]. Analysis here was therefore been limited to what was only provided in the scheme.</p> <p>1. As depicted by the statement in paragraph 13.3.67 of the PEIR, based on the operational GHG emissions, 138,000tCO<sub>2</sub>e is expected to be avoided as a result of</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The climate change chapter within the ES contains the references to baseline data and assessment tools.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			the scheme. If Construction and Decommissioning emissions are considered, would it not suggest that the scheme is a net carbon emitter? Please can you clarify?	Assessment considers the construction and decommissioning phases and the Proposed Development is not a net carbon emitter.
Chapter 13, Climate change	Lincolnshire County Council	6 September 2022	<p><u>Comparison with other forms of Energy Generation</u> Paragraph 3.4.12 – “This technology (onshore wind) has been considered for the Site and assessed at length. A planning application was approved for a 66MW wind farm. This has not been constructed and become operational due to difficulty in satisfying the Grampian condition...”.</p> <p>1. What was the contribution of the onshore wind farm initially considered to be in relation to GHG emissions? 2. What is the comparison of Heckington Fen solar farm (in terms of GHG offset and net savings) with other forms of Energy Generation Technologies?</p>	<p>The Applicant notes this comment.</p> <p>The onshore wind farm would have generated 66MW.</p>
Chapter 14, Transport and access	National Highways	8 August 2022	<p>I understand from the information provided within the consultation document that access to the solar park during the construction and operational phases is proposed via the A17 to the south of the site. Whilst the proposed access is under construction, a temporary construction access will be provided via an existing junction with the A17, approximately 600 metres southeast of B1395 Sidebar Lane junction.</p> <p>For traffic movements associated with the solar park, an 18 month construction period and a six day working</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>week is assumed. During this period around nine HGV deliveries per day on average (or up to 18 two way movements per day) is envisaged. This may vary at times depending on the stage of construction. In addition to the HGV movements, there will be a number of construction movements associated with smaller vehicles such as the collection of skips for waste management, the transport of construction workers and subcontractors.</p> <p>Any highway impact associated with this project will occur on the local road network which is managed and maintained by the Local Highway Authority. National Highways do not consider there will be any adverse impact on the Strategic Road Network, in this instance the A1 which routes approximately 20 miles to the east of Heckington Fen.</p> <p>As such National Highways has no further comments to make.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 14, Transport and access	Boston Borough Council	25 August 2022	In addition, cumulative effects of the cabling works of several other local schemes proposed at Temple Oaks, Folkingham and Bicker Solar Farm should be taken into account as these schemes also propose cabling works to connect to National Grid at Bicker. The potential for cumulative impacts on residential amenity, the environment and heritage assets should be taken into account, along with any proposed mitigation in relation to traffic movements, dust and noise impacts, especially during construction phases.	The Applicant notes this comment. They will account for these cumulative effects in the relevant chapters.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 14, Transport and access	Network Rail	30 August 2022	<p>In addition, the routing of construction traffic (including HGVs/abnormal loads) and subsequent operational site traffic will require further consideration and discussion with Network Rail if such routes take in railway assets such as bridges (with low clearance/weight restrictions) and railway level crossings (for example the railway level crossing at Swineshead Station).</p> <p>With these points in mind, at this stage the information supplied is not sufficiently detailed to fully assess potential impacts of the scheme on the railway and further information will be required to properly respond on the likely impacts of the proposed scheme.</p> <p>In order to ensure that the scheme does not impact on operational railway safety, the developer must liaise closely with Network Rail Asset Protection to ensure that the haulage routes into the site are appropriate, and the design and construction of the new facility and associated infrastructure will not have an adverse impact on railway operations (including glint and glare issues as outlined above). It is therefore assumed that a condition of the Order would be that detailed specifications of the proposed scheme and traffic management plans are to be provided and agreed in writing before development can commence.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. An Outline Construction Traffic Management Plan is provided with the DCO (document reference 7.10).</p> <p>The Applicant notes this comment. They will continue engaging with Network Rail on this issue.</p>
Chapter 14, Transport and access	North Kesteven District Council	1 September 2022	<u>14.3.5</u>	The Applicant notes this comment.



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			A Requirement might be necessary to address safety measures/closures for footpath users of Heck 15/1 during construction	
Chapter 14, Transport and access	North Kesteven District Council	1 September 2022	<p><u>14.4.4</u> At what point will construction traffic revert from the temporary construction access to the construction/operational access as shown on Plate 14.1?</p> <p>The ES chapter should set out the scale and type/extent of preparatory works being constructed from the temporary Construction Access and how the trigger point for reversion to using the main construction/operational access will be secured/enforced etc?</p>	<p>Construction traffic will revert to this access early in the construction phases. It is the intent that current access point will be used to bring in materials to build the new access point at the start of the construction programme. The operational site will use the new access point, as will a majority of the construction.</p> <p>The ES and Outline Construction Traffic Management Plan (document reference 7.10) will set this out.</p>
Chapter 14, Transport and access	North Kesteven District Council	1 September 2022	<p><u>14.5.30</u> Presume this is meant to say ‘...<u>no</u> direct...’</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 14, Transport and access	North Kesteven District Council	1 September 2022	<p><u>General comment</u></p> <p>The proposed provision of a new circular route recreational route that interconnects with the existing Public Rights of Way (PRoW) network is welcomed, however consideration should be given to securing this route as a permanent route that would be adopted as part of the adopted PRoW network rather than permissive routes which could potentially be removed at any point during the life of the project.</p>	The Applicant notes this comment.
Chapter 14, Transport and access	Royal Mail	1 September 2022	<p>Royal Mail has two operational properties within 10 miles of the proposed Solar Park: Sleaford DO and Boston DO/RTW.</p> <p>Whilst Royal Mail does not consider that the proposed Solar Park itself will impact upon its operational interests, the cumulative impact of this development and those in the vicinity that are of concern. Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by the proposed Heckington Fen Solar Park and surrounding developments. These include:</p> <ul style="list-style-type: none"> <li>• Cottam Solar Park;</li> <li>• Land at Ewerby Thorpe – erection of an array of solar panels;</li> <li>• Gate Burton Energy Park;</li> <li>• Land South of Gorse Lane Silk Willoughby – a proposed solar park;</li> <li>• Land at Little Hale Fen – a proposed solar farm and associated infrastructure and cabling to connect to Bicker Fen Substation;</li> <li>• Mallard Pass Solar Farm;</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<ul style="list-style-type: none"> <li>• West Burton Solar Park;</li> <li>• Land to the North of White Cross Lane – a proposed solar farm; and</li> <li>• Vicarage Drove Solar Farm.</li> </ul> <p>Any periods of road disruption / closure, night or day, on or to the roads immediately connected to these developments or the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail’s ability to meet its Universal Obligation service delivery targets.</p>	<p>They will continue engaging with Royal Mail throughout all stages of the Project’s development.</p>
Chapter 14, Transport and access	Royal Mail	1 September 2022	<p>As the design of the Solar Park has not been finalised and the fact that the traffic data used to assess the level of potential traffic impact was collected in March 2022, Royal Mail are unable to accurately assess the level of potential risk to its operations and any proposed mitigations.</p> <p>Consequently, at this point in time, Royal Mail are unable to provide a robust consultation response.</p> <p>Royal Mail wishes to reserve its position to submit a consultation response/s later in the DCO consenting process when sufficient information is available.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 14, Transport and access	Lincolnshire County Council	6 September 2022	<p>LCC, as the Highway &amp; Lead Local Flood Authority, has offered the following comments at this stage:</p> <ul style="list-style-type: none"> <li>• The PEIR is acceptable at this stage. The locations of the accesses is acceptable in principle and the traffic impact estimated for the development is limited (less than 20 HGVs per day). Provided the final ES submitted is based on similar assumptions (same build period, etc)</li> </ul>	<p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			then it would be acceptable although full details of any proposed highway improvement work (temporary or permanent) need to be provided within the ES. Any works and associated mitigation measures identified will need to be clearly described and assessed so extent of any impacts associated with such works are understood.	
Chapter 14, Transport and access	Lincolnshire County Council	6 September 2022	<p>The following comments are offered from LCC's Public Rights of Way (ProW) Team.</p> <ul style="list-style-type: none"> <li>• Whilst the route of Heckington PF15 is recorded as terminating at the District/Parish boundary between NKDC/ELDC (Heckington/Amber Fen) there may be existing, but unrecorded rights, extending further to the east. This has not been investigated by LCC at this stage but the possibility remains and therefore it would be advisable to undertake research to establish if any available evidence (enclosure award, tithe award etc) indicates that there could be a "reasonable allegation" that such rights subsist.</li> </ul>	The Applicant notes this comment.
Chapter 14, Transport and access	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• Whilst the IDB may have removed the footbridge at a mid-point along the above route, it is not correct to say that this will not be replaced. Although LCC may be tolerating the removal of the bridge at present, the act of removal would be an offence and LCC may insist it is replaced at a later date. It will be for the IDB to determine how this can be done so as not to restrict flows or to propose a scheme for an alternative route to avoid the need for crossing the watercourse. This NSIP project therefore presents an opportunity to resolve this current issue and so discussions about a suitable replacement bridge in this location would be</li> </ul>	The Applicant notes this comment. The community benefit fund (outside of the DCO process) could be used to look into the feasibility of a replacement bridge, but it is not considered possible to incorporate this

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			welcomed with the aim to provide a long-term solution that would provide wider community benefits and improvements to the PROW network.	into the Proposed Development.
Chapter 14, Transport and access	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>The proposed provision of a new circular route recreational route that interconnects with the existing Public Rights of Way (ProW) network is welcomed, however, LCC would prefer any such route to be secured as permanent route that would be adopted as part of the adopted ProW network rather than permissive routes which could potentially be removed at any point during the life of the project. The DCO process can be used to form new ProW routes and so LCC would advise that this route be adopted as formal, permanent route (with commuted sum being provided to enable LCC to thereafter maintain as part of the wider network). If not then detailed information should be made available and/or be presented as part of the ES to demonstrate that the permissive route would be retained and made available for use for the duration/life of the development (e.g. written into the terms of the lease agreements or other such legal agreement, planning conditions, etc). This will ensure that the routes offered as part of this development are deliverable and secured for the longer-term use and benefit of the local community.</li> </ul>	The Applicant notes this comment.
Chapter 14, Transport and access	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>Further comments will be provided as the project continues and the Environmental Statement is completed.</li> </ul>	The Applicant notes this comment.
Chapter 15, Air quality	Boston Borough Council	25 August 2022	In addition, cumulative effects of the cabling works of several other local schemes proposed at Temple Oaks, Folkingham and Bicker Solar Farm should be taken into	The Applicant notes this comment. They will account for these

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			account as these schemes also propose cabling works to connect to National Grid at Bicker. The potential for cumulative impacts on residential amenity, the environment and heritage assets should be taken into account, along with any proposed mitigation in relation to traffic movements, dust and noise impacts, especially during construction phases.	cumulative effects in the ES chapters where relevant.
Chapter 15, Air quality	UK Health Security Agency	26 August 2022	<p>Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impact assessment, and development consent.</p> <p>We have considered the submitted documentation and can confirm that we are satisfied with the approach taken in preparing the Environmental Impact Assessment (EIA) and the conclusions drawn. We wish to make no further comment at this time.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 15, Air quality	North Kesteven District Council	1 September 2022	<p><u>15.3.6</u> NKDC agrees that in principle there is sufficient information in the PEIR and the proposed ES chapters to allow this matter to be secured through a Requirement which considers matters such as wind directions, location of receptors, typical dust dispersion, travel distances etc</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 15, Air quality	North Kesteven District Council	1 September 2022	<u>15.3.14</u> The applicant should take account of any advice from LWT in relation to any heightened sensitivities from dust etc on the South Forty Foot Drain	The Applicant notes this comment.
Chapter 15, Air quality	North Kesteven District Council	1 September 2022	<u>15.4.11</u> NKDC notes and accepts the conclusion in this section in that the 1-hour mean NO2 objective is unlikely to be exceeded at these locations	The Applicant notes this comment.
Chapter 15, Air quality	North Kesteven District Council	1 September 2022	<u>Table 15.4</u> Table 15.4 pushes the NRMM assessment to CEMP even though PINS asked for information to be provided. The applicant notes 'further information on NRMM will be included within the outline CEMP. All NRMM will adhere to European regulations (EU 2016/1628) demonstrating compliance with emission limits'. The outline CEMP needs to be presented in the ES draft rather than deferring to a Requirement. NKDC does agree however that dispersion modelling is not required in relation to predicted construction traffic flows.	The Applicant notes this comment. The ES will include an outline CEMP (document reference 7.7).
Chapter 15, Air quality	North Kesteven District Council	1 September 2022	<u>15.5.6</u> NKDC agrees that Air Quality impacts are not likely to be significant on the basis of predicted two way vehicle trips	The Applicant notes this comment.
Chapter 15, Air quality	North Kesteven District Council	1 September 2022	<u>15.7.6</u> NKDC agrees that EPUK/IAQM thresholds for the potential impact to air quality are not likely to be exceeded in combination with Vicarage Grove Solar Farm	The Applicant notes this comment.
Chapter 15, Air quality	Lincolnshire County Council	6 September 2022	LCC does not have an in-house specialist and so has no specific comments to offer at this stage. We therefore	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			recommend and endorse any recommendations or comments made by North Kesteven District Council and Boston Borough Council on this particular topic.	
Chapter 16, Land use and agriculture	South Kesteven District Council	12 July 2022	<p>As you are aware, there are currently several large scale solar park proposals being considered across the South Kesteven District Council, Lincolnshire and adjoining authorities. These include Mallard Pass Solar Farm and Temple Oaks Renewable Energy Park (both NSIP scale in South Kesteven). SKDC request that the cumulative impacts of a loss of agricultural land, and in particular that considered to be best and most versatile is fully considered within the final Environmental Statement. This should include an assessment of any land currently used for arable crop growing that would be lost for the operational life of the development. In this respect, South Kesteven Local Plan Policy SP1 states:</p> <p><i>Proposals should protect the best and most versatile agricultural land so as to protect opportunities for food production and the continuance of the agricultural economy. Development affecting the best and most versatile agricultural land will only be permitted if:</i></p> <ul style="list-style-type: none"> <li><i>• There is insufficient lower grade land available at that settlement (unless development of such lower grade land would be inconsistent with other sustainability considerations); and</i></li> </ul>	<p>The Applicant notes this comment. The impact on BMV land is considered in the ES (Chapter 16 – document reference 6.1.16). The Applicant has reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p> <p>The Applicant notes this comment. Over 80% of the land is grade 3 land, and suffers the usual constraints of heavy soils, notable blackgrass infestation and a general susceptibility to wetness, both of which constrain farming activities.</p>



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			<ul style="list-style-type: none"> <li>• <i>Where feasible, once any development which is permitted has ceased its useful life the land will be restored to its former use, and will be of at least equal quality to that which existed prior to the development taken place (this requirement will be secured by planning condition where appropriate).</i></li> </ul>	<p>The Applicant notes this comment. The use of sheep for grazing will help improve site soils, which will be of benefit when the land is returned to agricultural use after the operational life of the Project.</p>
Chapter 16, Land use and agriculture	Amber Hill Parish Council	15 August 2022	<p>The Councillors discussed the consultation documents and felt that their previous comments still applied. Original comments made in February 2022. Cllrs discussed the information received regarding the Solar farm, noting that they will be 4.5m high and have a lifetime of 40 years, although it is yet to be decided whether they would be tracking or fixed. Cllrs resolved that they are in favour of a Solar farm as such, however they do have concerns about the fact that the land to be used is Good quality land that will be removed from agricultural production. The land currently proposed to be used is a mixture of grade 1 and 2 land, capable of producing good crops of roots and vegetables. Grade 3 and 4 land would be far more appropriate for a solar farm.</p>	<p>The land will still be classified as agricultural land. The area underneath and around the panels is proposed to be managed with sheep grazing. Some of the land is classified as 'best and most' versatile (grade 1 = 11.1%; grade 2 = 7.4% and grade 3a = 30.5%), but this is mainly split between areas near the A17. Some portions are also scattered amongst tracts of</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				poorer soils. Some of the better-quality land on Six Hundreds Farm has been left out of the site area altogether (some 62ha). The vast majority (80%) of the development land is grade 3, and suffers the usual constraints of heavy soils, notably blackgrass infestation and a general susceptibility to wetness, both of which constrain current farming activities.
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	Comments are provided by Landscape at Appendix3 which should be read alongside our feedback on this chapter as well as in relation to 'alternatives' (where we consider that the ES needs to consider an alternative 'scale' of development reducing the developed area within areas of BMV land). We raise concerns that the parts of the site identified for BNG would not be available for continued agricultural use. Any material enhancement in the botanical diversity of the sward (to the extent that this site is considered to be of ecological value), will limit the capacity for the land to be returned to arable use after the solar farm has been	The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>decommissioned. As a general observation there is some conflict between maintaining the land in agricultural production and improving biodiversity.</p> <p>The provisional (semi-detailed) 138-auger assessment and report undertaken by Kernan presents significantly different findings and divergence from the provisional ALC.mapping of the area. Most of the site ( energy park + BNG area) is Grade 1 and the remainder Grade 2 according to the provisional map, The approach advocated by Landscape would be to target additional augering (in line with NE guidance) into the areas of most divergence (i.e. where the poorer quality non-BMV soils are now identified) rather than focussing on further characterising the Grade 1-3a BMV however it is noted that the survey update proposed by Kernon seeks to address this.</p>	<p>The Applicant has updated the agricultural land classification of the site based on survey data gathered from over 450 soil samples (taken by soil augers) from across the land holding (by an independent third party). The provisional mapping is not based on this level of detailed analysis. The survey showed that some of the land is classified as 'best and most' versatile (grade 1 = 11.1%; grade 2 = 7.4% and grade 3a = 30.5%), mainly split between areas near the A17. Some portions are also scattered amongst</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				tracts of poorer soils. It is worth noting that some of the better-quality land on Six Hundreds Farm has been left out of the site area altogether (some 62ha). The vast majority (80%) of the development land is grade 3, and suffers the usual constraints of heavy soils, notably blackgrass infestation and a general susceptibility to wetness, both of which constrain current farming activities. Savills have prepared a detailed note on the practical implications of farming (document reference 6.3.16.1).
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	The chapter generally focuses on the ALC results for the area proposed for the solar panel arrays within the Energy Park (i.e. excluding the Potential Biodiversity Net Gain areas). The commentary notes that the soils in the BNG areas will be unaffected. Whilst the BNG areas are not envisaged to experience any operational	The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			development/soil disturbance and would be subject to grass/wildflower seeding and grazing (details to be confirmed), nevertheless they are indivisible from the project and will still have altered agricultural opportunity for the duration of the project; as highlighted by Landscape.	to enable ongoing agricultural use.
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	The BNG areas correspond more broadly with the parts of the overall site where BMV Grade 1 and 2 soils have been identified and as such we consider that the submission ES should include either an additional table or an expanded table 16.1 to clearly show the amounts and proportions of BMV in the energy park site, and those within the BNG areas. We do not agree that referring to BNG areas as having 'unaffected soils'/nil impact is a particularly transparent assessment.	The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	The previously forwarded appeal decision (Appeal Ref: APP/K2610/W/21/3278065 Land north of The Street, Cawston, Norfolk) contains a relatively detailed commentary on the approach to impacts on BMV in relation to solar farms. Whilst this was a decision made under the TCPA 1990 rather than the 2008 Act nevertheless it sets out some general principles that can be applied here; not least in the context of the management/continuance of agricultural activity on such sites during scheme operation.	The Applicant notes this comment.
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	The Appeal decision confirms a two-stage approach namely that, if it can be demonstrated that non-BMV land has been prioritised for development ahead of BMV land, to what degree can continued (and meaningful) agricultural use of the BMV land areas occupied by the development take place. In the case of	The Applicant notes this comment. The use of sheep for grazing will help improve site soils, which will be of

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			the Norfolk scheme the Inspector was somewhat critical of the proposal to rely on grazing between and under the arrays while in situ and that, essentially, such measures could apply to most agricultural land and were overly simplistic to offset and justify the use of BMV.	benefit when the land is returned to agricultural use. The Applicant has reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	Other than reference to a contract with a local sheep grazier the PEIR does not include any details of the specific pastoral use of the site by reference to a wider grazing plan. The Council is concerned that, set in the context of the appeal decision and specifically the inference that there is a 'higher bar' in relation to demonstrating meaningful continued use of BMV agricultural land through grazing (over and above a more simplistic or informal approach), there is very little information available at this stage to understand how a meaningful reversion from arable to pastoral use (in particular on the BMV areas) will be implemented and secured for the lifetime of the development.	The Applicant notes this comment. Details of the proposed ongoing agricultural use of the Energy Park land are outlined in the OLEMP (document reference: 7.8).
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	Whilst we understand that contractual obligations with the shepherd remain confidential, from the information presented to date (i.e. without details of the density of grazing etc) it has not been possible to assess whether and how a change to pastoral use will align with relevant agricultural industry best practice and address the guidance in draft EN-3 regarding the avoidance of using BMV land where possible.	The Applicant notes this comment. Details of the proposed ongoing agricultural use of the Energy Park land are outlined in the OLEMP

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				(document reference 7.8).
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<p>Please note that the comments below should be read alongside the attached advice prepared by Landscape, which can be summarised as follows:</p> <ul style="list-style-type: none"> <li>• Landscape do not consider that the work undertaken to date is sufficient to meet the requirements given that the land is provisionally mostly BMV Grade 1 and 2. The Natural England maps of Best and Most Versatile land indicate a high chance of BMV in this location, and to date the findings of the semi-detailed survey runs contrary to the 'expected' outcome. However the PEIR acknowledges that the ALC survey has been carried out at a semi-detailed level and it is noted that Kernon, Natural England and Landscape have discussed a revised strategy of augering which will be carried out on site from early September 2022.</li> </ul>	<p>The Applicant notes this comment. They have updated the agricultural land classification of the site is based on survey data gathered from over 450 soil samples (taken by soil augers) from across the land holding (by an independent third party).</p> <p>The Natural England maps are not based on this level of detailed analysis. The survey showed that some of the land is classified as 'best and most' versatile (grade 1 = 11.1%; grade 2 = 7.4% and grade 3a = 30.5%), mainly split between areas near the A17. Some</p>

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				<p>portions are also scattered amongst tracts of poorer soils. It is worth noting that some of the better-quality land on Six Hundreds Farm has been left out of the site area altogether (some 62ha). The vast majority (80%) of the development land is grade 3, and suffers the usual constraints of heavy soils, notably blackgrass infestation and a general susceptibility to wetness, both of which constrain current farming activities. Savills have prepared a detailed note on the practical implications of farming (document reference 6.3.16.1).</p>
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<ul style="list-style-type: none"> <li>• There are concerns (see also below) that the parts of the site identified for BNG would not be available for continued agricultural use. Any material enhancement in the botanical diversity of the sward (to the extent</li> </ul>	The Applicant notes this comment. They have reduced the BNG areas in the



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			<p>that this site is considered to be of ecological value), will limit the capacity for the land to be returned to arable use after the solar farm has been decommissioned. The EIA (Agriculture) (England) (No.2) Regulations 2006 prohibit the physical or chemical cultivation of what are considered to be 'semi-natural areas'.</p> <p>There is therefore some conflict between maintaining the land in agricultural production and improving biodiversity. Whilst not incompatible, site based issues, such as soil type(s) and local agricultural practices may create future problems. The biodiversity areas particularly target the highest grades on agricultural land and any future restriction that might prevent its return to cultivation should be a material consideration not least in the drafting of any Requirement/s.</p>	<p>southern and southwestern parts to enable ongoing agricultural use.</p>
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<ul style="list-style-type: none"> <li>• This part of Lincolnshire is a mainly arable farming area with only limited sheep grazing operations. Whilst it is perfectly possible to graze the areas under and between the panels, it is unlikely to be very cost effective for a grazier. The difficulties of rounding up sheep and handling them, together with finding sick or wounded animals makes the graziers workload harder and more complex. The economics of moving sheep to and from the site are therefore likely to be marginal. Land in use for solar panels is generally ineligible for the normal agricultural subsidies, such as the Basic Payment Scheme (now being phased out) and the Environmental Land Management Scheme (ELMS). It does not prevent land from being managed in similar ways but there will be no payments available to</li> </ul>	<p>The Applicant notes this comment.</p>

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			farmers (eg graziers) for compliance and this could make grazing less financially attractive going forward	
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<ul style="list-style-type: none"> <li>• Soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction but not all and it is possible that long term drainage issues occur on site owing to construction practices.</li> </ul>	The Applicant notes this comment. An outline Soil Management Plan is included as part of the outline CEMP (document reference 7.7).
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	We note that paragraph 9.3.3 references potential adverse effects resulting from compaction of the ground caused by construction plant and an increase in the extent of impermeable surfaces associated with access roads and compound areas. Paragraph 9.4.34 considers embedded mitigation and references 'best practice working methods to prevent both water pollution and adverse impacts upon the surface water drainage regime' however this does not specifically refer to whether and how soil compaction stemming from vehicle tracking across the site can be mitigated/remedied to avoid the localised surface water incidents evidenced by Landscape on solar parks elsewhere.	The Applicant notes this comment. The ES will cover mitigation. An outline Soil Management Plan is included as part of the outline CEMP (document reference 7.7).
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<p><u>16.3.3</u></p> <p>The ES should set out whether the specification and areas to be targeted by additional augering have been agreed in advance with Natural England. The paragraph notes that this soil sampling will focus on the areas of the Energy Park which have initially been identified as land that is Best and Most Versatile (BMV). As set out in</p>	The Applicant notes this comment. They have updated the agricultural land classification of the site based on survey

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			<p>the accompanying report from Landscape, the provisional (semi-detailed) 138-auger assessment and report undertaken by KCC presents significantly different findings and divergence from the provisional ALC mapping of the area. Most of the site (energy park + BNG area) is Grade 1 and the remainder Grade 2 according to the provisional map. The approach advocated by Landscape would be to target additional augering (in line with NE guidance) into the areas of most divergence (i.e. where the poorer quality non-BMV soils are now identified) rather than focussing on further characterising the Grade 1-3a BMV however it is noted that the survey update proposed by Kernon seeks to address this.</p>	<p>data gathered from over 450 soil samples (taken by soil augers) from across the land holding (by an independent third party). The provisional mapping is not based on this level of detailed analysis. The survey showed that some of the land is classified as 'best and most' versatile (grade 1 = 11.1%; grade 2 = 7.4% and grade 3a = 30.5%), mainly split between areas near the A17. Some portions are also scattered amongst tracts of poorer soils. It is worth noting that some of the better-quality land on Six Hundreds Farm has been left out of the site area altogether (some 62ha). The vast majority (80%) of the</p>

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				development land is grade 3, and suffers the usual constraints of heavy soils, notably blackgrass infestation and a general susceptibility to wetness, both of which constrain current farming activities. Savills have prepared a detailed note on the practical implications of farming (document reference 6.3.16.1).
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<u>16.3.4</u> This paragraph does not identify the potential for variances in the relative proportions of the BMV grades within the surveyed areas and the degree to which there is interplay with the consideration of 'alternatives'.	The Applicant notes this comment.
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<u>16.7.1 and 16.7.2</u> As above (but noting the comments provided by Landscape), has the KCC approach to detailed augering been agreed with NE; namely focussing on the areas of proposed hard surfacing/infrastructure/substations and more targeting augering the areas initially identified as BMV? Paragraph 16.7.1 suggests that as the physical method of affixing the panels results in an impact that	The Applicant notes this comment. The approach to focus the more detailed soil sampling work on land that was BMV and used for hard

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			<p>is reversible that it does not impact on the underlying grade.</p> <p>Whilst it is accepted that the varying elements of the scheme will result in different physical degrees of impact (compaction, disturbance etc) of soil, it does not directly address the impacts of loss of/ altered opportunity to access and use the land unfettered for agricultural purposes for the duration of the project although it is accepted that this issue is referred to elsewhere in terms of proposed sheep grazing (see below).</p>	<p>standing was agreed with NE.</p> <p>The Applicant notes this comment.</p>
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<p><u>16.8.5 and Table 16.1/16.2</u></p> <p>The results and associated commentary in these sections focus on the ALC results for the area proposed for the solar panel arrays within the Energy Park (i.e. excluding the Potential Biodiversity Net Gain areas). The commentary notes that the soils in the BNG areas will be unaffected. Whilst the BNG areas are not envisaged to experience any operational development/soil disturbance and would be subject to grass/wildflower seeding and grazing, nevertheless they are indivisible from the project and will still have altered agricultural opportunity for the duration of the project. The BNG areas correspond more broadly with the parts of the overall site where BMV Grade 1 and 2 soils have been identified and as such we consider that the submission ES should include either an additional table or an expanded table 16.1 to clearly show the amounts and proportions of BMV in the energy park site, and those within the BNG areas. We do not agree</p>	<p>The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p>

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			<p>that referring to BNG areas as having ‘unaffected soils’/nil impact is a particularly transparent assessment.</p> <p>As set out in the Landscape comments, there are concerns that the parts of the site identified for BNG would not be available for continued agricultural use and that (depending on the way in which the BNG areas are managed over the lifetime of the project), whether or not these areas could revert back to agricultural land (for instance, in compliance with a management/restoration plan) at the end of the project lifetime.</p> <p>We note from the sketch in the 19th August Kernon letter that large parts of the proposed BNG areas (which largely correspond with Grade 1 and 2 BMV land) are not proposed for additional survey work and therefore we assume that the current (semi-detailed) findings for these areas will be carried across into the ES.</p>	<p>The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p> <p>The Applicant notes this comment. The ES has provided additional evidence and findings based on survey data gathered from over 450 soil samples (taken by soil augers) from across the land holding (by an independent third party).</p>
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<p><u>16.8.12-16.8.14</u> There is reference throughout the chapter to the grazing of sheep on the land and that in principle a contract has been secured with a local shepherd. The chapter, read alongside the ecology and ornithology</p>	The Applicant notes this comment. They have reduced the

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			chapter, suggests that there will be alternate periods of grazing across the energy park site and the BNG land; with the latter experiencing lesser frequency/density grazing in order to maximise biodiversity value. Whilst this appears to be a reasoned approach and we note the predictions of high level BNG (%) estimated for delivery, by the same token it reduces the degree to which the BNG land in particular can claim meaningful agricultural continuance. As set out above the BNG land has been evidenced to comprise primarily the highest (Grade 1 and 2) BMV land.	BNG areas in the southern and southwestern parts to enable ongoing agricultural use.
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<p><u>16.9.4</u> Where will the soils be stored (see above query regarding the formation of the flood risk mitigation bunds around the BESS), and how would soil quality/value be preserved over 40 year period; is any intervening management/treatment required to maintain quality?</p>	<p>The CEMP (document reference 7.7) contains outline Soil Management Plans.</p> <p>Minimal bunds for flooding risk are needed around the ESS. Design detail is outlined in the elevation plans which shows how the electrical kit has been raised off the ground. The transformer within the onsite substation will need a bund, but this is a small structure.</p>

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Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<p><u>16.9.11</u>  The paragraph notes that construction will be short term so the magnitude of change would be low. As there is no detailed soil data for the Grid Route a worst-case scenario of all land being BMV has been made. BMV land has a sensitivity of very high – high. Have Natural England stipulated that auger testing for the grid route is required depending on the selected route? It would be helpful to understand whether NE request augering to test typical grades or whether they are satisfied that the ALC mapping can be used as a proxy. It is noted though that the approach is to assume a worst case scenario that the soils are all BMV.</p>	<p>The Applicant notes this comment. To date ALC grading has not taken place along the Grid route. NE requested an outline soil management plan (document reference 7.7) and understood the intention of the design was to place all above ground kit in the field margins, when technically possible to minimise the impact on the ongoing agricultural use of the land.</p>
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<p><u>16.9.13 to 16.9.18</u>  These paragraphs refer more broadly to proposals for the continued agricultural use of the land, principally by grazing with sheep, and grassland management. The paragraphs note that the reduced-intensity use of the land and soil has the potential for overall benefits to soils as a result of arable soils reverting to seasonal pasture, through build-up of organic matter.</p> <p>The commentary notes that there will be changes to farming practices within the Energy Park for the duration of the Proposed Development and that whilst</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>arable farming will be unlikely, grassland farming and biodiversity land management will occur and which will involve land management requirements. The conclusion is that the area of BMV land within the Energy Park is a small fraction of the BMV land area of Lincolnshire and that set in this context the predicted permanent loss of less than 5 ha BMV is considered to be insignificant in a regional context.</p> <p>As set out above the Council considers that BMV implications should be considered holistically across the application site as a whole (energy park + BNG areas) rather than with specific BMV implications within the energy park area. The BNG land incorporates areas of Grade 1 and 2 BMV land and where it has been stated that there will be (deliberately) more limited intervention through sheep grazing.</p> <p>Whilst the Council does not dispute the overall conclusion in terms of the significance of impact on a Lincolnshire-scale, the loss of agricultural opportunity for a 40 year period through the use of 318ha of BMV land (table 16.1) should arguably be concluded as 'significant' (adverse) at a local level on the basis that (paragraph 16.4.4) the IEMA methodology considers the permanent sealing of land or ALC downgrading of more than 20 hectares to be a major adverse magnitude of impact. Landscape draw the same conclusion in their advice to the Council. Whilst the proposals are temporary/reversible in nature we do not agree that set in the context of the IEMA guidance the</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

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			<p>focus should be concluding the overall level of impact/significance based on the ‘permanent losses’ associated with the scheme (which are stated as being less than 5ha of BMV/regionally insignificant). The EN statements, NPPF and CLLP are all consistent in that they call for prioritisation of lesser value agricultural land, without distinguishing between whether a particular scheme results in permanent loss or loss of opportunity for continued agricultural use.</p> <p>The previously forwarded appeal decision (Appeal Ref: APP/K2610/W/21/3278065 Land north of The Street, Cawston, Norfolk) contains a relatively detailed commentary on the approach to impacts on BMV in relation to solar farms. Whilst this was a decision made under the TCPA 1990 rather than the 2008 Act nevertheless it sets out some general principles that can be applied here; not least in the context of the management/continuance of agricultural activity on such sites during scheme operation. Paragraphs 14 and 17 are of particular relevance:  ‘14. The proposed solar farm would occupy land within the site for a temporary period of forty years, after which the land would return wholly to agricultural use, with grazing possible between and under the arrays while in situ. It seems to me that these justifications could be made on most agricultural land and more than these simple measures are required to justify the use of BMV for the proposal, as there is likely to be an effect on food production over the 40-year period, which in</p>	<p>The Applicant notes this comment.</p>

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			<p>more meaningful terms itself exceeds a generation of change’.</p> <p>And</p> <p>’17. The appeal scheme therefore fails to demonstrate that it would be necessary for all of the agricultural land within the site to be used for the siting of the proposed solar arrays, or that poorer quality land would be used in preference to higher quality land, as required by the WMS, NPPG and the Framework. I acknowledge that the proposal would allow for continued agricultural use and biodiversity improvements around arrays, in accordance with the NPPG, but these conditions need to be met alongside the use of BMV land. I address these matters further in the third main issue and the Planning Balance. For these reasons, I have therefore arrived at a different conclusion to the Inspectors for the appeal decisions for other solar farms and proposals on BMV land to which I have been referred’.</p> <p>The above commentary confirms a two-stage approach namely that, if it can be demonstrated that non-BMV land has been prioritised for development ahead of BMV land (stage 1), to what degree can continued (and meaningful) agricultural use of the BMV land areas occupied by the development take place. In the case of the Norfolk scheme the Inspector was somewhat critical of the proposal to rely on grazing between and under the arrays while in situ and that, essentially, such measures could apply to most agricultural land and</p>	<p>The Applicant notes this comment. The use of sheep for grazing will help improve site soils, which will be of benefit when the land is returned to agricultural use. The Applicant has reduced the BNG areas in the southern</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>were overly simplistic to offset and justify the use of BMV.</p> <p>There are some similarities between the appeal decision and the information provided to date in the PEIR in relation to continued agricultural use and management of the site. As set out above, at this stage there are only very high level and broad proposals for the continued agricultural use of the land, principally by grazing with sheep, and grassland management. A different regime is proposed on the BNG land. The Council is concerned that, set in the context of the appeal decision and specifically the inference that there is a 'higher bar' in relation to demonstrating meaningful continued use of BMV agricultural land through grazing (over and above a more simplistic or informal approach), there is very little information available at this stage to understand how a meaningful reversion from arable to pastoral use (in particular on the BMV areas) will be implemented and secured for the lifetime of the development. Whilst we understand that contractual obligations with the shepherd remain confidential, from the information presented to date (i.e. without details of the density of grazing etc) it has not been possible to assess whether and how a change to pastoral use will align with relevant agricultural industry best practice.</p>	<p>and southwestern parts to enable ongoing agricultural use.</p> <p>The Applicant notes this comment. Details of the proposed ongoing agricultural activity on the Energy Park site are outlined in the OLEMP (document reference 7.8).</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>The archived BRE 'National Solar Centre Agricultural Good Practice Guidance for Solar Farms' whilst dating to 2014, sets out that 'the developer, landowner and/or agricultural tenant/licensee may choose to graze livestock at higher stocking densities throughout the year over much of the solar farm, especially where the previous land use suggested higher yields or pasture quality. Between 4 and 8 sheep/hectare may be achievable (or 2-3 sheep/ ha on newly-established pasture), similar to stocking rates on conventional grassland'.</p> <p>It also suggests that details of the specific pastoral use of solar farms should be established as part of a wider grazing plan – for example whether this relates to the use of land between panels for fattening/finishing of lambs.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 16, Land use and agriculture	North Kesteven District Council	1 September 2022	<p><u>16.9.20</u> As mentioned above the ES should set out whether and how soil can be stored and managed on site for a period of up to 40 years and how does this affect quality and productivity?</p>	<p>The Applicant notes this comment. Limited soil will need to be stored on site. The effects of storage of soil on the grading of the land is seen in the outline Soil Management Plans (document reference 7.7).</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p><u>Instructions to Landscape</u>  As discussed on the phone we would be pleased if you could initially review the NKDC response to the BMV section of the Scoping Opinion, the PINS Scoping Opinion itself (by way of background information) the 'land use and agriculture' section of the PEIR and the non-technical summary and provide your advice in relation to: 1. Whether or not in the PEIR the applicant has adopted the correct approach to assessing cumulative impacts on a Lincolnshire-wide basis alongside the other known NSIPs in West Lindsey/Bassetlaw and Rutland/SKDC and whether you're minded to agree with the applicants findings that impacts would not be 'significant' in that context; or whether further discussion and evidence is required in the ES</p>	The Applicant notes this comment.
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p><u>1. Cumulative Impacts</u>  There are a number of small(er) and largescale Solar PV schemes in Lincolnshire, with others planned or proposed. There are four known solar project NSIP schemes; specifically in relation to impacts on agricultural land. The situation is a moving picture as new proposals come forward from time to time. Most of these sites are proposed on farmland. Lincolnshire and N Kesteven in particular are agricultural areas with substantial areas for land within the Best and Most Versatile category. Much of the non BMV land will be Grades 3b and 4 with very little Grade 5.</p> <p>A county-level alternative assessment area should be applied which as a minimum should consider scope for</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			connection into the National Grid at the locations proposed by the registered NSIP solar projects named above, and with specific consideration of agricultural land impacts.	
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p>2. Whether the applicant’s spatial approach to additional augering is appropriate (nb Ecotricity have already discussed with Natural England we understand) or whether augering should be targeted differently</p> <p><u>2. Spatial Approach</u>  The augering of the site should be undertaken in line with TIN 049 and the MAFF 1988 Guidelines, one auger point per hectare and with occasional soil pits particularly where soil types vary. On a site of this size the amount of augering should be around 500 auger holes and probably 3 or 4 pits to verify the soil profiles – more if there are significantly different soils. Soil types should be laboratory analysed for textural assessment to provide accurate information that can be relied upon in calculating the ALC grade.</p> <p>The soils are described as (mainly) 813g Wallasea 2. These are summarised as Deep stoneless clayey soils. Calcareous in places. Some deep calcareous silty soils. Flat land often with low ridges giving a complex soil pattern. Groundwater controlled by ditches and pumps. A more detailed description is provided in Appendix 1. However the PIER recognises that there is a complex variety of soil textures and drainage status (Wetness Class) over the surveyed site, which reflects the variety of Tidal Flats Deposits deposited by the sea</p>	<p>The Applicant has updated the agricultural land classification of the site based on survey data gathered from over 450 soil samples (taken by soil augers) from across the land holding (by an independent third party).</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>in the past. This variation does warrant close inspection.</p> <p>Kernon Countryside have drawn up a new programme of works (Appendix 2) to undertake further augering during August and September that should fill in the missing areas. This work has been agreed with Natural England.</p> <p>It is my view that where the preliminary work has identified significant differences from published data, particularly the provisional ALC maps and the predicted Best and Most Versatile status, those areas should be assessed as a priority. Generally the Kernon Countryside proposals seek to address this with a more focused approach on the areas identified by Natural England to be in need of clarification. Natural England have provided a map of areas of search and the Kernon Proposals in Appendix 2 seek to identify and clarify the areas of difference and apparent discrepancy. Laboratory analysis of representative samples is proposed to determine textures.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p>3. Whether the information presented in the PEIR to date gives confidence that the estimated BMV proportions on site are accurate?</p> <p><u>3. Estimated BMV amounts</u> I don't consider that the work undertaken to date is sufficient to meet the requirements given that the land is provisionally mostly Grade 1 and 2. Further the Natural England maps of Best and Most Versatile land</p>	The Applicant notes this comment. They have updated the agricultural land classification of the site is based on survey data gathered



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>indicate a high chance of BMV in this location. So far the ALC work on site runs contrary to this 'expected' outcome, although I have no reason to believe that it is suspect at this stage. However the PEIR acknowledges that the ALC survey has been carried out at a semi-detailed level.</p>	<p>from over 450 soil samples (taken by soil augers) from across the land holding (by an independent third party).</p> <p>The Natural England maps are not based on this level of detailed analysis. The survey showed that some of the land is classified as 'best and most' versatile (grade 1 = 11.1%; grade 2 = 7.4% and grade 3a = 30.5%), mainly split between areas near the A17. Some portions are also scattered amongst tracts of poorer soils. It is worth noting that some of the better-quality land on Six Hundreds Farm has been left out of the site area altogether (some 62ha). The vast majority (80%) of the</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				development land is grade 3, and suffers the usual constraints of heavy soils, notably blackgrass infestation and a general susceptibility to wetness, both of which constrain current farming activities. Savills have prepared a detailed note on the practical implications of farming (document reference 6.3.16.1).
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	However, there have been a number of independent ALC reports undertaken in the vicinity with one at Heckington and one further East of the site. Both of these assessments found exclusively BMV land, though the soil types appear to have been different in each case. There is undoubtedly a lot of BMV land in this vicinity and only a full ALC will identify where it is and what the Grade and quality is.	""
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	The revised programme of soil sampling and pit digging (Appendix 2) should help complete the picture, assuming it is undertaken in the manner set out in the MAFF 1988 guidelines. Kernon Countryside have contacted me and copied me into their proposed plan. It is expected that 5-10 days of soil augering will be	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			undertaken on site to determine the grades in accordance with national guidance.	
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	This programme outlined should now give a more comprehensive view of the soils and ALC Grade(s) of the site. The soil scientists tasked with the work are experienced and should undertake the work correctly.	The Applicant notes this comment.
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p>4. Whether the applicant’s approach of setting aside some of the higher value BMV land to ecological net gains will help preserve the BMV value of that land and whether initial proposals for management of the ecological net gain land are appropriate in the context of safeguarding that agricultural value in the longer term (i.e. post-40 years once the site is decommissioned)</p> <p><u>4. Ecological Effect</u> If the land is used for biodiversity it would not be available for agriculture. However even if it is available for some form of cutting or grazing it is unlikely that the ALC grade will change significantly during the life of the project. There is evidence that organic matter builds up in biodiversity areas at a faster rate than arable farmland and this may benefit the land, but it is not a factor in the assessment of ALC.</p> <p>Long term, where biodiverse land becomes ecologically important there is the possibility of land becoming assigned with environmental designations, such as SSSI status, though generally this has not so far occurred on other solar sites.</p>	<p>The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>Revisions to the Environmental Impact Assessment rules regarding the cultivation of agricultural land suggest that if land remains uncultivated for longer than five years, then permission may be required from Natural England to bring the land back into cultivation.</p> <p>Any material enhancement in the botanical diversity of the sward (to the extent that this site is considered to be of ecological value), will limit the capacity for the land to be returned to arable use after the solar plant has been decommissioned. The EIA (Agriculture) (England) (No.2) Regulations 2006 prohibit the physical or chemical cultivation of what are considered to be 'semi-natural areas'.</p> <p>Cultivation is not clearly defined and does not necessarily require land to have been ploughed. The application of pesticides and fertiliser may be sufficient, but the biodiverse areas are much less likely to receive these treatments once established and there is the possibility that large areas of environmentally interesting land may therefore not be allowed to return to arable farmland after the 40 year period. This is a complex area as there may be planning conditions that require land to be returned to agriculture as part of any consent and it is an open question whether the compliance with a 'restoration' condition 'trumps' any future environmental status or requirement.</p>	<p>The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p> <p>The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p> <p>The Applicant notes this comment.</p>

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			<p>Grazing management at this Site is not easily compatible with standard biodiversity management practices at Solar Photovoltaic sites due to fundamental population biology principles. As the site is in arable production at present, it currently has a relatively low level of biodiversity. The grazing management plan may, therefore, lead to a modest increase in species richness at the site from current base levels, but it will not deliver the level of biodiversity that the site could potentially achieve if biodiversity gains were prioritised over agricultural production.</p> <p>By grazing land for agricultural livestock production, the level of disturbance is high. This prevents plant species with a slow establishment rate (which often are those which are ultimately strong competitors) from growing – and thus the invertebrates that feed on these species are also excluded from the area.</p> <p>Areas which promote high species diversity often use low intensity grazing as a means to promoting biodiversity. Grazing represents a form of disturbance to the area, thus preventing any one species becoming too dominant. It also helps manage the sward to provide an optimum habitat for invertebrates.</p> <p>Grazing for biodiversity enhancement usually occurs between October and April, which will allow plants to flower and set seed. The stock densities are monitored and adjusted to prevent either under and overgrazing</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. Some areas would not allow grazing during spring</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>and to ensure the sward contains a mix of long and short vegetation with some plants in flower.</p> <p>There is therefore some conflict between maintaining the land in agricultural production and improving biodiversity. Whilst not incompatible, site based issues, such as soil type(s) and local agricultural practices may create future problems. The biodiversity areas particularly target the highest grades on agricultural land and any future restriction that might prevent its return to cultivation should be a consideration in the planning process and in the conditioning of any consent.</p>	<p>until birds have finished nesting and flowers seeded.</p> <p>The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.</p>
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p>5. Your comments on the likely challenges/success of the applicant’s approach to reverting from arable to sheep grazed pasture within both the panelled and ecological net gain areas in terms of the continuance of agricultural ‘value’; whether we have sufficient information as to how that will be achieved and delivered.</p> <p><u>5. Sheep Farming</u> This part of Lincolnshire is a mainly arable farming area with only limited sheep grazing operations. Whilst it is perfectly possible to graze the areas under and between the panels, it is unlikely to be very cost effective for a grazier. The difficulties of rounding up sheep and handling them, together with finding sick or wounded animals makes the graziers workload harder and more complex.</p>	<p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>As such the economics of moving sheep to and from the site will be marginal. However, most examples quoted do not charge much or anything for the grazing and this may make it sufficiently attractive for a local farmer or shepherd with a 'flying flock'.</p> <p>Land in use for solar panels is generally ineligible for the normal agricultural subsidies, such as the Basic Payment Scheme (now being phased out) and the Environmental Land Management Scheme (ELMS). It does not prevent land from being managed in similar ways but there will be no payments available to farmers (eg graziers) for compliance and this could make farming less financially attractive going forward.</p> <p>The site will probably have to be seeded to grass, but this will probably occur after the panels have been sited on the land. In my experience grass does not grow well under the panels themselves. There are often areas that are dry and barren or that host weeds.</p> <p>Soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction but not all and it is possible that long term drainage issues occur on the site due to the construction. Appendix 3 shows photographs of before during and after construction of a large solar farm in Hampshire where soil structural issues were a</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. An outline Soil Management Plan is included as part of the outline CEMP (document reference 7.7)</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			major problem post construction. Once the panels are in place usual agricultural practices such as subsoiling become difficult	
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p>6. In the context of your knowledge of the District ALC resource and the stated quantity of BMV within the site (about 54%; approx. 316ha) whether you agree with the applicant that subject to their mitigation proposals there will be ‘no significant adverse effects’ at a District-level</p> <p><u>6. District ALC</u>  For a project of this scale there is an impact the project will tie up the land for up to 40 years, there will be some impact. The area is large locally and if the quantities of BMV are as stated or similar then the impact will be reasonably small. However if the BMV is greater and of higher grades then I would expect the impact to be significant at a District Level.  Environmental Impact Assessments give guidance on the size and quality of Land Grade that is or can be affected by development proposals. The loss of such a large area of land would normally be considered as significant at District level, even though the use is ‘temporary’. Any permanent loss of land due either to construction or through biodiversity designation may affect this assessment.</p>	The Applicant notes this comment.
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p><u>7. Further Comments</u>  <u>Cable Route</u>  A soil management plan should be considered for the cable route in order to minimise the impact on soil</p>	The Applicant notes this comment.



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			structure, land drainage and ultimately soil quality. Guidance is available in published documents.	
Chapter 16, Land use and agriculture	North Kesteven District Council (Landscape)	1 September 2022	<p><u>Appendix 1</u>  <u>0813g WALLASEA 2</u>  <u>Detailed Description</u></p> <p>This association is extensive on reclaimed marine alluvium in the marshlands of Lincolnshire, Cambridgeshire and Norfolk, and is also present in Romney Marsh, the Essex marshes and in Holderness. The land is generally level but there are occasional ridges on the sites of former creeks. The soils are mainly Wallasea series, pelo-alluvial gley soils; Newchurch series, pelo-calcareous alluvial gley soils; Blacktoft series, gleyic brown calcareous soils; and Wisbech series, calcareous alluvial gley soils. Wallasea and Newchurch soils are clayey with a greyish brown topsoil over greyish or grey and ochreous mottled subsurface horizons; Newchurch series is calcareous. Blacktoft soils are calcareous and fine silty with grey colours and mottling in the subsoil. Wisbech soils are also calcareous, but have greyish and mottled coarse silty horizons below the plough layer, often with sedimentary laminations. Wallasea series predominates and Newchurch, Blacktoft and Wisbech soils are common. Dymchurch, Snargate, Agney, Stockwith, Tanvats and Paglesham series also occur.</p> <p>Wallasea soils consistently constitute over half of the association, but the proportion of other soils varies widely throughout the country. Generally, Wisbech and Blacktoft series are found on or near former creeks</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>(rodhams), with Wallasea and Newchurch soils in the intervening areas. The incidence of creek ridges, and so the proportion of coarser soils, increases seawards where Blacktoft soils cover a third of the land, except in Lincolnshire where the similar Agney series is more common. The proportion of the less common Wisbech soils also increases seawards. Inland towards high ground, clayey soils are predominant, Wallasea soils being most common in Lincolnshire and Cambridgeshire, but in Norfolk, Newchurch and Wallasea soils are co-dominant. In places in Lincolnshire, Wallasea soils have developed from former Downholland soils from which topsoil organic matter has been lost by oxidation. Wisbech soils are rare in north Lincolnshire and non-calcareous soils, including Pepperthorpe and Tanvats series, become more common. Near Huttoft, where islands of Devensian till rise through the alluvium, some Holderness soils are included. Creek ridges are uncommon in Essex and Wisbech soils are rare. Calcareous fine silty Agney soils cover one sixth of the land and non-calcareous Tanvats and Paglesham soils also occur. Locally there are a few saline soils and, where leaching has occurred, subsoil structure has deteriorated causing silting of drains, waterlogging and reduced crop yields.</p> <p>As there are very few creek ridges near the Humber, Wallasea soils predominate over large areas, with Newchurch and rarer Dymchurch soils occurring randomly. Blacktoft soils are found round the edges of</p>	<p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>the delineations, and, less commonly, Burlingham soils are included where the association adjoins soils on Devensian till. It occurs in Humberside between Sunk Island and the Holderness till plain; in Cleveland along the tidal reaches of the Tees; and in Northumberland in two very small areas near Alnmouth Bay and Beadnell Bay.</p> <p>In the central part of Romney Marsh in Kent, the association corresponds to the land type with creek ridges on decalcified "Old" marshland. On creek ridges on either side of the Rhee Wall, non-calcareous coarse silty Snargate soils are dominant, with finer textured Tanvats soils, formerly part of the Finn series, towards their margins. Wallasea series is the main soil of the pool areas between the creek ridges with subsidiary Dymchurch and Pepperthorpe soils. In the west of the Marsh, calcareous Wisbech, Blacktoft and Agney soils are locally common and in the north-east where creek ridges are few and narrow, Wallasea, Pepperthorpe and Newchurch soils dominate, with Tanvats series as the main soil on creek ridges.</p> <p>Soil Water Regime Most of the land is pump-drained and the more permeable Blacktoft and Wisbech soils are well drained (Wetness Class I). Wallasea and Newchurch soils are less permeable but respond to underdrainage; drained soils are occasionally waterlogged (Wetness Class II) but undrained soils are waterlogged for long periods in winter (Wetness Class III or IV). Droughtiness</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>assessments for selected crops are given in Table 38. Droughtiness slightly restricts the growth of arable crops in Wallasea and Newchurch soils. Wisbech soils have large available water reserves and are non-droughty whilst Blacktoft soils are intermediate in droughtiness. Grassland suffers from drought on all soils in south Lincolnshire, Norfolk and Essex but growth is less restricted in the higher rainfall area of north Lincolnshire.</p> <p><b>Cropping and Land Use</b>            With adequate underdrainage, Wallasea and Newchurch soils are moderately easy to work. There are adequate days for safe cultivation in autumn and spring, but in north Lincolnshire the moist climate reduces the opportunity for spring cultivation, particularly in wet years, and the soils are marginal for spring-sown crops. The land is generally used for winter cereals and ley grassland, but sugar beet, peas and field brassicas are grown in the drier districts. The use of heavy machinery often causes topsoil compaction and surface wetness on the heavier soils especially Wallasea series though they can be direct drilled very successfully if subsoiled periodically. Newchurch soils which are calcareous have a more stable structure. Wisbech and Blacktoft soils are less suitable for direct drilling because of the problems associated with this system on silty soils.</p>	<p>The Applicant notes this comment. Further details on the practical farming of the land are included at Appendix 16.1 Savills Report (document reference 6.3.16.1)</p>
Chapter 16, Land use and agriculture	Natural England	1 September 2022	Our comments on Soils and Agricultural Land will follow this response as confirmed via email. Apologies for the delay in this advice	The Applicant notes this comment. Further details on the

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				soil sampling density were discussed with Natural England's specialist.
Chapter 16, Land use and agriculture	Lincolnshire County Council	6 September 2022	LCC does not have an in-house specialist however the following comments are offered at this stage. We also recommend and endorse any recommendations or comments made by North Kesteven District Council and Boston Borough Council on this particular topic.	The Applicant notes this comment.
Chapter 16, Land use and agriculture	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• All arable land of whatever agricultural classification produces food, whether for animal feed or human consumption, and so LCC considers this should be protected for its own sake.</li> </ul>	The Applicant notes this comment.
Chapter 16, Land use and agriculture	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• The Energy Park would utilise a total area of around 586ha of agricultural land of which 48% is identified as BMV agricultural land (Grades 1-3a). This is a significant area and having compared the current site layout (Figure 3.2) and Plan KCC3076/02 within the Semi-detailed Agricultural Land Classification Survey contained in Appendix 16.2, it appears that much of the PBNG land consists of Grade 1 and Grade 2 BMV land and so the highest quality within the site. The PBNG areas and Community Orchard would effectively be taken out of agricultural productive use for at least 40 years if not permanently given some of this land (e.g. Community Orchard) could be well established and of ecological value by the end of the project lifetime. It is therefore disingenuous to suggest the loss of BMV land would be limited to only that where the PV arrays are proposed as the actual loss would be much greater at around 350ha when you take into account the PBNG</li> </ul>	Some of the land is classified as 'best and most' versatile (grade 1 = 11.1%; grade 2 = 7.4% and grade 3a = 30.5%), but the vast majority (80%) of the development land is grade 3, and suffers the usual constraints of heavy soils, notably blackgrass infestation and a general susceptibility to wetness, both of which constrain current farming activities. The

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			areas and Community Orchard too (i.e. 252ha BMV within the solar array site + 96ha PBNG area and 1.8ha Community Orchard).	Applicant has reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.
Chapter 16, Land use and agriculture	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• Consideration should therefore be given to alternative layouts to remove the higher grade BMV land from the scheme entirely with the PBNG and Community Orchard being accommodated within the remaining site area and PV panels being focused on the poorer quality land so as to avoid any permanent loss of higher grade land.</li> </ul>	The Applicant notes this comment. They have reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use.
Chapter 16, Land use and agriculture	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• It is also recommended that the final ES includes a table that presents clearly how much BMV land would be lost as a result of the development and that this should include all land required to deliver the project including that which forms part of the PBNG and Community Orchard. This way it will be clear how much BMV land would be lost.</li> </ul>	The Applicant notes this comment.
Chapter 16, Land use and agriculture	Lincolnshire County Council	6 September 2022	<ul style="list-style-type: none"> <li>• The PEIR suggests that an Outline Landscape Environmental Management Plan (LEMP) will support the ES that will detail those areas within the Energy Park that will be managed principally for biodiversity and those areas for agricultural practice. Although it is stated that the majority of the Energy Park would be grazed it is also stated that the sheep would be low intensity. The change from intensive arable agriculture to grassland habitat may offer benefits in terms of</li> </ul>	The Applicant notes this comment. The ongoing agricultural activities on the Energy Park site are outlined in the OLEMP (document reference 7.8)

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			biodiversity however those benefits must be balanced against the impact/loss of this land from productive arable use. Low density sheep grazing is not a like for like replacement in terms of 'value' and more information is therefore required on what low density grazing means so a comparison between the current arable use and proposed pasture use is understood (e.g. stocking densities of sheep flock/periods of time or % of time that sheep would be grazed across the site, etc).	
Chapter 17, Glint and glare	Boston Borough Council	25 August 2022	Any potential for glint and glare on local receptors such as Boston Aerodrome should be taken into account.	The Applicant notes this comment.
Chapter 17, Glint and glare	Network Rail	30 August 2022	Key concerns will be how the scheme impacts on the railway operations in terms of glint and glare issues causing distraction for train drivers approaching and passing the site, how any issues of this nature that may arise are to be mitigated, the management of construction works around the operational railway and details such as boundary treatments, any lighting and drainage schemes that may impact on the operational railway.	The Applicant notes this comment. Glint and glare on train drivers is considered in Chapter 17 (document reference 6.1.17)
Chapter 17, Glint and glare	North Kesteven District Council	1 September 2022	<p><u>17.3.15</u> The applicant should ensure that NATS and MOD Defence Estates agree with these overall conclusions</p> <p>The PEIR/Appendix document goes not appear to contain information regarding the maximum permissible/suggested 'green glint' and 'yellow glint' exposure periods against which the overall thresholds and impacts have been assessed. The ES should set out</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			what these thresholds are with reference to adopted guidance.	
Chapter 17, Glint and glare	North Kesteven District Council	1 September 2022	<u>17.5.16</u> The applicant should ensure that Network Rail agree with these overall conclusions	The Applicant notes this comment. They have engaged with Network Rail on this issue (per the above).
Chapter 17, Glint and glare	North Kesteven District Council	1 September 2022	<u>17.6.4</u> Mitigation of any residual glint and glare impacts might need to take into account hard boundaries/fencing rather than relying on maturity of soft landscaping. The ES should identify as necessary where fixed/solid boundaries are required.	The Applicant notes this comment.
Chapter 17, Glint and glare	Lincolnshire County Council	6 September 2022	LCC has no other comments to offer at this stage.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (community orchard)	Lincolnshire Wildlife Trust	8 July 2022	I have been in contact with someone regarding the community orchard for the site. They recommend ~100 trees per acre which for the solar farm site would bring us to 450 trees and I am told that we may have to plant the trees in phases unless we are able to source trees from multiple local orchards.  After discussing the suitability of the site with the people from [REDACTED] the trees will need to be ~4.5m apart with mesh guards (they'll get too hot with solid tree guards) in a place that is both sheltered from the wind and unshaded. They'll grow to a maximum height of around 4m but deer, hare and rabbits may be an issue if there isn't already sufficient fencing around the orchard.	The Applicant notes this comment.  The Applicant notes this comment.



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			I made it clear that to them that his was mainly fact finding for the moment as I wasn't sure what the anticipated start date would be for this aspect of the development.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	Lincolnshire has a number of small, medium, and large solar parks or farms which have over the past 10 years been subject to theft, criminal damage and other crime types, including theft of solar panels, and removal of cabling and infrastructure which has proved costly to the various developers and management companies that operate such facilities therefore the security and safety of the sites should be an important feature of the planning and design of the sites.	The Applicant notes this comment. CCTV and fencing are included in the site layout. They will continue engaging with Lincolnshire Police on security issues.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	Solar Farms or Solar Parks have in recent years been subject of some significant thefts of the installed solar panels with replacement costs more than £40,000. I would ask that consideration to the specific and detailed measures that are to be taken by the developers on this site are explained.  <b><i>I would strongly avoid the use of what is described as 'Deer Fencing' as this does not provide any difficulty or deterrent to the criminal.</i></b>	The Applicant notes this comment. They will continue engaging with Lincolnshire Police on security issues.  The Applicant notes this comment.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	<b>Fencing and Boundary Treatment.</b>  I have attached a copy of national guidance which reinforces this principle and would recommend that the boundary fence is to a minimum of LPS 1175 level 3 and to a height of 2.4 metres or to the current UK	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>Government standard, SEAP (Security Equipment Approval Panel) class 1-3.</p> <p>The use of 2.4 metre welded mesh fencing (in green) would be the most unobtrusive method of providing a secure perimeter border. All gated entrances should be secured with appropriate access systems.</p>	<p>The Applicant notes this comment.</p>
<p>Chapter 18, Miscellaneous issues (security)</p>	<p>Lincolnshire Police</p>	<p>20 July 2022</p>	<p><b>Monitored CCTV System.</b></p> <p>Whilst taking into account the often-isolated locations that Solar Farms are to be installed the installation of a remotely monitored with motion detection CCTV system is an effective deterrent and is most likely to provide effective evidence should a crime occur.</p> <p>Installers of remotely monitored detector activated CCTV systems will comply with all of the following standards and guidelines:</p> <ul style="list-style-type: none"> <li>• NPCC Security Systems Policy</li> <li>• BS 8418 Installation and remote monitoring of detector activated CCTV systems – Code of Practice</li> <li>• BS EN 50132-7: CCTV Application guidelines</li> </ul> <p>RVRCs monitoring detector activated CCTV systems will conform to all of the following standards:</p> <ul style="list-style-type: none"> <li>• BS 5979 (Cat II):</li> <li>• BS 8418: Installation and remote monitoring of detector activated CCTV systems – Code of Practice</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			There will probably be little reward in deploying CCTV or other defence unless it is monitored in some way or can provide an instant alert in some form.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	<b>Physical security of panels.</b>  It has been identified that individual panels can be easily removed from the aluminium frames which are usually secured by a small bracket which is in turn secured by an alum key. Whilst aluminium can itself be easily forced the use of an additional security bracket may help reduce the ease by which panels can be removed adding to the time that a criminal would need to remove panels increasing the risk to offenders.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	Whilst not intending to draw attention to a solar farm the effective use of signage to act as an informative deterrent may also be considered.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	I would ask that the applicant considers a perimeter alarm system now we are aware that these sites are attracting criminal interest.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	There have been several instances where offenders have been able to access sites quite easily with large vehicles enabling the large-scale removal of panels and equipment. Due to the poor planning and design (particularly across fields and tracks in dry weather) they spent some considerable time undetected.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	<b>Use of Defensive Ditches and Berms (Bunds)</b>  Landscaping techniques such as ditches and berms (bunds) may also be appropriate in some instances. To be effective in stopping vehicles these need to be designed carefully. Police can provide further specific	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			advice in relation to the design of such defences upon request. There should be a minimum number of vehicular access points onto site, ideally only one.	
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	<p><b>Use of Natural Features and Vegetation.</b></p> <p>The use of natural vegetation as a feature should not compromise the benefit of clear and unobstructed natural and formal (CCTV System) surveillance.</p>	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (security)	Lincolnshire Police	20 July 2022	I would recommend that the developers and planners liaise with Lincolnshire Police once planning has been granted and when thought to all security and safety measures have been considered.	The Applicant notes this comment. They will continue to engage with Lincolnshire Police on this issue.
Chapter 18, Miscellaneous issues (overhead lines – easement/wayleave agreements)	National Grid Electricity Transmission	25 August 2022	<p>The following points should be taken into consideration. Electricity Infrastructure:</p> <ul style="list-style-type: none"> <li>▪ National Grid’s Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset</li> </ul>	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (overhead lines – safety clearances)	National Grid Electricity Transmission	25 August 2022	<ul style="list-style-type: none"> <li>▪ Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004).</li> <li>▪ If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety</li> </ul>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	
Chapter 18, Miscellaneous issues (overhead lines – working safely)	National Grid Electricity Transmission	25 August 2022	<ul style="list-style-type: none"> <li>▪ The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive’s (<a href="http://www.hse.gov.uk">www.hse.gov.uk</a>) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.</li> <li>▪ Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.</li> </ul>	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (overhead lines – drilling and excavation works)	National Grid Electricity Transmission	25 August 2022	<ul style="list-style-type: none"> <li>▪ Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above</li> </ul>	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (cables – legal protection)	National Grid Electricity Transmission	25 August 2022	<ul style="list-style-type: none"> <li>▪ National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are</li> </ul>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.	
Chapter 18, Miscellaneous issues (cables – ground levels)	National Grid Electricity Transmission	25 August 2022	<ul style="list-style-type: none"> <li>▪ Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.</li> </ul>	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (safety – existing pipeline)	Health and Safety Executive	26 August 2022	<p>According to HSE's records the proposed DCO application boundary for this Nationally Significant Infrastructure Project is not within any consultation zones of major accident hazard sites but is within 1 zone of a major accident hazard pipelines. This is based on the current configuration as illustrated in, for example, figure 1 'ENERGY PARK SITE LOCATION PLAN' within the document 'DEVELOPMENT CONSENT ORDER APPLICATION FOR GROUND MOUNTED SOLAR PANELS, ENERGY STORAGE FACILITY, BELOW GROUND GRID CONNECTION TO BICKER FEN SUBSTATION AND ALL ASSOCIATED INFRASTRUCTURE WORKS. ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT LAND AT SIX HUNDREDS FARM, SIX HUNDREDS DROVE, EAST HECKINGTON, SLEAFORD, LINCOLNSHIRE ON BEHALF OF ECOTRICITY (HECK FEN SOLAR) LIMITED'</p> <p>The proposed development is within the inner, middle and outer zones of a Major Accident Hazard Pipeline (MAHP) operated by National Grid Gas PLC (NGG). The pipeline passes under the A17 between East Heckington and Maize Farm running in a general north</p>	The Applicant notes this comment. They will continue engaging with the Pipeline Operator (National Grid Gas) throughout all stages of the Project's development.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>south orientation but curving south east to the south of the A17. The proposed Solar Park development directly overlies the MAHP and the applicant has marked it on the proposed site development layout contained in the consultation booklet. Although site personnel will be limited to maintenance and support staff there 2 will be significant personnel onsite during the construction phase. Also, since the works will entail excavation for cabling and driven foundations for new structures, HSE strongly recommends that at the earliest opportunity, the applicant liaises with the Pipeline Operator (NGG). There are three particular reasons for this: i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline; ii) the standards to which the pipeline is designed and operated may restrict developments within a certain proximity of the pipeline. Consequently there may be a need for the operator to modify the pipeline or its operation, if the development proceeds; iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.</p>	
Chapter 18, Miscellaneous issues (safety – hazardous substances)	Health and Safety Executive	26 August 2022	<p>The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended. HSC would</p>	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations. Further information on HSC should be sought from the relevant Hazardous Substances Authority.	
Chapter 18, Miscellaneous issues (safety – consideration of risk assessments)	Health and Safety Executive	26 August 2022	Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development’s vulnerability to major accidents. HSE’s role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate’s website - Annex G – The Health and Safety Executive . This document includes consideration of risk assessments on page 3.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (safety – explosive sites)	Health and Safety Executive	26 August 2022	As there are no HSE licensed sites in the vicinity of the proposed development HSE Explosives Inspectorate have no comment to make.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (safety – electrical safety)	Health and Safety Executive	26 August 2022	No comment from a planning perspective	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (health – general)	UK Health Security Agency	26 August 2022	<p>Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID.</p> <p>Please note that we have replied to earlier consultations as listed below and this response should</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>be read in conjunction with that earlier correspondence: Request for Scoping Opinion 07/02/2022.</p> <p>The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from, for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.</p>	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (health – electromagnetic fields)	UK Health Security Agency	26 August 2022	We have considered the submitted documentation in section 18.5 of the PEIR. We are satisfied that the applicant is aware of the EMF guidance and that this should be taken into account in the approach taken and the conclusions drawn. We wish to make no further comment at this time.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (cumulative effects)	UK Health Security Agency	26 August 2022	The Outer Dowsing Offshore Wind Farm has recently requested a scoping opinion from the Secretary of State (SoS), which will involve an on-shore cable route leading potentially to the area around Boston, and as such should be included within the assessment of cumulative effects.	The Applicant notes this comment. They will include the Outer Dowsing Offshore Wind Project within

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
				their assessment of cumulative effects.
Chapter 18, Miscellaneous issues (management of construction works)	Network Rail	30 August 2022	Key concerns will be how the scheme impacts on the railway operations in terms of glint and glare issues causing distraction for train drivers approaching and passing the site, how any issues of this nature that may arise are to be mitigated, the management of construction works around the operational railway and details such as boundary treatments, any lighting and drainage schemes that may impact on the operational railway.	The Applicant notes this comment. Glint and glare on train drivers is considered in Chapter 17 (document reference 6.1.17)
Chapter 18, Miscellaneous issues (safety – adjacent land)	Network Rail	30 August 2022	Consideration should be given to ensure that the construction and subsequent maintenance can be carried out without adversely affecting the safety of, or encroaching upon Network Rail’s adjacent land. In addition, security of the railway boundary will require to be maintained at all times.	The Applicant notes this comment. Engagement with Network Rail continues, including the requirement to drill underneath the railway line.
Chapter 18, Miscellaneous issues	North Kesteven District Council	1 September 2022	Table 18.2 'Potential Major Accidents and Disasters associated with the Proposed Development' highlights the flood risk potential of a flood defence breach and that the issue will be considered in the flood risk and hydrology chapter. This should also include the implication of any failure or breach of the proposed on-site bund around the substation/BESS during a flood event.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues	North Kesteven District Council	1 September 2022	<u>Table 18.2</u> Table 18.2 'Potential Major Accidents and Disasters associated with the Proposed Development' highlights the flood risk potential of a flood defence breach and	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>that the issue will be considered in the flood risk and hydrology chapter. This should also include the implication of any failure or breach of the proposed on-site bund around the substation/BESS during a flood event. In addition whilst Table 18.2 and 18.3.14 and 18.3.15 mention risk of fire associated with the design of equipment this does not specifically address the fire/explosion risk associated with the use of Lithium Ion batteries as required through the Scoping Opinion although it is noted that risks and mitigation associated with the potential use of Lithium Ion batteries is detailed in 18.3.24 onwards.</p>	
Chapter 18, Miscellaneous issues	North Kesteven District Council	1 September 2022	<p><u>18.4.31</u> The Scoping Opinion requires consideration of waste impacts associated with panel degradation and the need for replacement during the project operational lifetime and we note that 18.4.31 confirms that solar panels contain aluminium which can be recycled, and the remaining glass and silicon mix can be ground up into other building materials and industrial applications. Information obtained from GreenMatch noted 96% of materials can be reused for produced new solar panels.</p> <p>The electrical infrastructure, should it need replacing is also likely to be taken apart and recycled. It might assist with clarity to estimate and quantify the % of panels requiring replacement or repair during project operation.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Chapter 18, Miscellaneous issues	North Kesteven District Council	1 September 2022	<u>18.5.17</u>	

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>The PEIR confirms that the scope of the assessment of EMFs is limited to consideration of any cables associated with the Proposed Development which exceed 132kV. The only part of the Development to exceed this voltage is the underground export cable between the Proposed Development 400kV Substation and the existing National Grid Bicker Fen Substation which will be an underground 400kV cable system. The PEIR also notes that the requirement to consider EMF exposure guidance is fully understood by the Applicant and has been factored into the consideration of the route alignment from an early stage. Consistent with the above comments relating to noise, and noting that EMF impacts are not anticipated within the energy park site itself, for the absolute avoidance of doubt it is advised to check, confirm and rule out that none of the pupils at Elm Grange School have any hypersensitivity to EMF which requires further consideration.</p>	<p>The Applicant notes this comment. They will engage with Elm Grange School on this issue. It should be noted that in the ES, this school is called 'Build a Future East Heckington' at the request of the Head Teacher. Consultation with them continues.</p>
Chapter 18, Miscellaneous issues	Lincolnshire County Council	6 September 2022	LCC has no specific comments to offer at this stage.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (figures included within the PEIR)	Lincolnshire County Council (AAH Consultants)	6 September 2022	Generally: Figures are well presented and read well	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (figures included within the PEIR)	Lincolnshire County Council (AAH Consultants)	6 September 2022	<p>Figure 2.1 Indicative Site Layout: Could it be clarified if this plan is intended to ultimately be developed to be issued as a parameter plan indicating areas of development and areas of mitigation and enhancement? This would make understanding the scheme proposed and subsequently the LVIA easier as it would be clear where and how areas would be</p>	<p>Figure 2.1 is considered to be a parameter plan against which the ES has been assessed.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>changed from the baseline, or clearly describe/illustrate mitigation used – this would be pertinent where the avoidance of a likely significant effect is reliant upon illustrated mitigation measures. If not, this could be misleading as development could theoretically be anywhere on site, based on a worst case approach, therefore if plans are indicative, they should be very clearly labelled so.</p> <p>The larger and taller elements such as substations and battery storage are also indicated on this plan. If these elements were accompanied with clear design parameters, it would aid understanding of the scheme as a “worst case”.</p> <p>Due to the evolving nature of the layouts, there are currently no Landscape and Visual Comments on the layout itself. However, it is requested that additional meetings and workshops be held with AAH/LCC to discuss these landscape and visual comments prior to the final ES and scheme submission, and also that a continued dialogue is maintained in regards to the development proposals, including the location of any larger structures or buildings such as the substation.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. Engagement with LCC with AAH continued during the preparation of the ES.</p>
Chapter 18, Miscellaneous issues (figures included within the PEIR)	Lincolnshire County Council (AAH Consultants)	6 September 2022	Figure 3.1 Working Indicative Site Layout and Figure 3.2 Working Indicative Site Layout (Revision E): It has been assumed Figure 2.1 of the PEIR is the most up to date layout, therefore, Figures 3.1 and 3.2 have been included to provide detail on the evolution of the layout based on consultee comments. These provide a useful reference as to how the layout is evolving.	The Applicant notes this comment.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Chapter 18, Miscellaneous issues (figures included within the PEIR)	Lincolnshire County Council (AAH Consultants)	6 September 2022	Figure 4.1b Proposed Site Access and internal access, Figure 4.1c Proposed Solar PV Development Areas, Figure 4.1d Proposed Battery Storage and New Infrastructure, Figure 4.1e Proposed Ecological Enhancements for Operational Energy Park, and Figure 4.1f Proposed Permissive Footpath: Similarly for the comments for Figure 2.1, could it be clarified if these plans are intended to ultimately be developed in the ES to be issued as a parameter plans indicating areas of development and areas of mitigation and enhancement?	These 4.1a-f plans are a breakdown of the elements of the Energy Park (which are shown as a whole within Figure 2.1). The ES assessment for the Energy Park is against these figures.
Chapter 18, Miscellaneous issues (figures included within the PEIR)	Lincolnshire County Council (AAH Consultants)	6 September 2022	Figure 6.2 Visual Receptors Plan: The Sustrans route and PROW are marked on the plan, however other potential visual receptors are not located on the figure which would be useful: settlements, transport routes and the railway are difficult to distinguish from other elements, particularly interspersed with the drainage ditches which criss-cross the study area.	The Applicant notes this comment.
Chapter 18, Miscellaneous issues (figures included within the PEIR)	Lincolnshire County Council (AAH Consultants)	6 September 2022	Figure 6.3 Screened Zone of Theoretical Visibility and Proposed Viewpoint Locations for Substation Locations, Energy Storage Areas, and Solar Area (3 separate SZTVs combined into one figure): This is a useful figure, and illustrates a lot of pertinent information beyond what has previously been presented. However, for this to be a useable figure for the LVIA, the locations and design parameters of the substations and storage areas would need to be fixed and ZTV run on the maximum parameters. The plan does illustrate additional areas of potential visibility that are not covered by the currently proposed viewpoints. The proposed viewpoints were previously discussed with AAH, and subsequently initial	The Applicant notes this comment. They continued to engage with LCC on this issue.

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>comments on viewpoints within AAH TM02, recommending additional viewpoints or amendments to those proposed, have not been incorporated into the figures, and we would request further discussions and meetings are held between AAH and other stakeholders with Pegasus.</p>	
<p>Chapter 18, Miscellaneous issues (figures included within the PEIR)</p>	<p>Lincolnshire County Council (AAH Consultants)</p>	<p>6 September 2022</p>	<p>Figure 6.4 Context Baseline Views: We request additional consultation is carried out to agree additional viewpoints, as per consultation comments within AAH TM02.</p> <ul style="list-style-type: none"> <li>• Comments on specific viewpoints as follows: <ul style="list-style-type: none"> <li>-VP01B: View needs rotating to the right (south) to incorporate the southern area of the site. View is currently the same as VP01A.</li> <li>-VP08: The view doesn't include the southern section of the site and may benefit from being split over two sheets (to create view 08A and 08B).</li> </ul> </li> </ul>	<p>The Applicant notes this comment. They continued to engage with LCC on this issue.</p>
<p>Chapter 18, Miscellaneous issues (figures included within the PEIR)</p>	<p>Lincolnshire County Council (AAH Consultants)</p>	<p>6 September 2022</p>	<p>Figure 6.7 Photomontages: Three viewpoints have been developed in the PEIR as photomontages (VPs 6, 8, 18), which we assume have been included as examples of those to be included within the LVIA. At this stage, photomontages have not been discussed or agreed with AAH/LCC, or as we understand any [sic] other stakeholders or appropriate consultee. We request consultation is held with AAH/LCC and other stakeholders in regards to agreeing the views taken forward as photomontages, the AVR Level that would be most appropriate to illustrate the proposals, which we would assume would be Level 2 or Level 3, however photo wire (Level 0 or Level 1) may be more appropriate in some long distance or fully screened</p>	<p>The Applicant notes this comment. The maximum parameters of these elements is considered in the application and associated photomontages (document reference 6.2.6).</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			views and what Type (would likely be Type 3 or 4), to Landscape Institute TGN 06/19 Visual Representation of Development Proposals. Taller/larger elements appear to have been shown on the photomontage (purple blocks) which appear as to reflect design parameters. The LVIA should include these elements to the maximum design parameters associated with the application, and the photomontages/methodology should clearly state that this is what is being illustrated. If the locations of these elements are not fixed as part of the application, this should also be clearly stated to aid transparency.	
Chapter 18, Miscellaneous issues (PEIR appendices)	Lincolnshire County Council (AAH Consultants)	6 September 2022	<p>Appendix 6.1 LVIA Methodology:</p> <ul style="list-style-type: none"> <li>• Paragraph 1.7 refers to a 5km Study Area, however paragraph 6.3.9 of the main text refers to a 3km Study Area. The LVIA should clarify this and clearly state what the study area is and provide justification for its extents. We would also query the statement that views of proposals beyond 1km would not be perceptible. This seems unlikely, particularly larger and taller elements of the development such as the substations.</li> <li>• Paragraph 2.1 states that landscape effects would be limited to the area occupied by the Proposed Development. This may not always be the case, and would anticipate there may be potential effects in the area immediately surrounding the site where the landscape character may indirectly change, for example, from currently being an open rural landscape, to one that contains development and artificial</li> </ul>	<p>The Applicant notes this comment. The ES will state what the study area is and provide justification for its extents.</p> <p>The Applicant notes this comment.</p>



Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>landform (bunds) that screen views and effect the perception of openness and “big skies”.</p> <ul style="list-style-type: none"> <li>• Paragraph 2.3 and Table 2 in regards to landscape value should include LI guidance: Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations, May 2021 by the Landscape Institute.</li> <li>• Table 2 implies that only landscapes that are designated may be classed as having high value, which is not always the case and LI guidance (TGN 2/21) in regards to assessing landscape value should be utilised.</li> <li>• Table 4 provides criteria for assessing landscape sensitivity based on landscape value and susceptibility. While not a requirement, would this information be clearer presented in a matrix that would guide the judgement of landscape sensitivity?</li> <li>• Table 6 focusses mostly on the scale of change on Landscape Character and doesn’t cover duration and extent of change adequately. These aspects should also be covered within the methodology and subsequent LVIA.</li> <li>• Table 9 provides criteria for assessing visual sensitivity based on view value and receptor susceptibility. While not a requirement, would this</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. The LVIA includes the tools to follow the assessment made using a matrix.</p> <p>The Applicant notes this comment. The LVIA includes the tools to follow the assessment made using a matrix.</p> <p>The Applicant notes this comment.</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>information be clearer presented in a matrix that would guide the judgement of visual sensitivity?</p> <ul style="list-style-type: none"> <li>• Table 10 focusses mostly on the scale of change for visual receptors and doesn't cover duration and extent of change adequately. These aspects should also be covered within the methodology and subsequent LVIA.</li> <li>• Paragraph 5.3 and Table 11 states that only effects of a Major level would be considered as Significant. Therefore the methodology is stating that moderate or moderate to major landscape and visual effects may not be considered significant. We disagree with this, which is a variation from typical assessments that may class effects moderate (and above) as significant: no justification in the methodology is provided for this and could lead the assessment as being deemed as underplaying the identification of significant effects.</li> <li>• Table 12 provides typical descriptors of landscape effects, however this approach feels restrictive and could imply, for example, that only low sensitivity receptors may experience minor adverse effects, which is not the case. Could this information be presented in a more flexible way that removes specific judgements from the descriptions?</li> <li>• Table 13 provides typical descriptors of visual effects, however similarly to Table 12, this approach feels restrictive and could imply, for example, that only low sensitivity receptors may experience minor adverse</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment. Cumulative assessment and methodology is</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>effects, which is not the case. Could this information be presented in a more flexible way that removes specific judgements from the descriptions?</p> <ul style="list-style-type: none"> <li>• No methodology for cumulative landscape and visual effects is provided. We would expect this to be included and carried out within the LVIA.</li> </ul>	<p>included within the LVIA (document reference 6.1.6).</p>
Chapter 19, Summary	North Kesteven District Council	1 September 2022	<p>Reflective of our comments made under the relevant sub-headings, at this stage unfortunately we cannot support all of the conclusions regarding the significance of effects; notably in relation to Land Use and Agriculture, Cultural Heritage and potentially Socio-Economic impacts.</p>	<p>The Applicant notes this comment. They will continue engaging with North Kesteven District Council on these issues.</p>
Chapter 19, Summary	North Kesteven District Council	1 September 2022	<p><u>19.2.2</u> Paragraph 19.2.2 notes that prior to mitigation, significant effects are anticipated in relation to Landscape and Visual; Residential Amenity; Socio-Economics; and Land Use and Agriculture. However table 19.1 summarises that the latter relates to cumulative effects only (i.e. taken alongside the other proposed solar NSIPS in Lincolnshire). For the reasons set out above we disagree with this conclusion and consider that effects on District-level BMV should be classified as ‘significant’. It has not yet been demonstrated whether and how allowing agricultural activities to continue on land for the operational lifetime of solar schemes will reduce residual effects to from ‘major adverse’ to ‘moderate adverse’ as no details of proposed grazing etc are provided. In the context of ‘generational’ impacts on food production</p>	<p>The Applicant notes this comment. The land will still be classified as agricultural land. The area underneath and around the panels is proposed to be managed with sheep grazing. The Applicant has also reduced the BNG areas in the southern and southwestern parts to enable ongoing agricultural use. They</p>

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>the Norfolk appeal decision referred to was critical of an overly simplistic approach to offsetting agricultural land impacts and justifying the use of BMV though grazing of the land and whilst we do not infer the same here the appeal decision appears to set a higher bar of evidencing meaningful agricultural continuance to mitigate the use of BMV land for solar development.</p> <p>We also do not agree that cumulative operational phase effects (for the Proposed Development and cumulative solar schemes listed in 11.7.1) is significant in EIA terms in terms of socio-economic impacts. The conclusion is drawn taking into account the 4 NSIP solar schemes that are located outside the District and where the impacts on job creation and the labour market within the District itself are unclear. It is likely that West Lindsey and Bassetlaw DC's will seek to promote job creation/contract awarding arising from these schemes within their own Authority areas and as such the degree of positive socio-economic impact within NKDC is at best unknown at this stage. Table 19.1 also states that significant (beneficial) effects are expected through decommissioning (increase in employment in the construction sector and in terms of GVA), however 11.5.17 states that 'the significance of the temporary effect is therefore considered to be minor to moderate beneficial, which is not significant in EIA terms'. This should therefore be clarified as it appears to be inconsistent.</p>	<p>will continue engaging with North Kesteven District Council on this issue.</p> <p>The Applicant notes this comment. Socio-economic impact of decommissioning is considered in ES Chapter 11 (document reference 6.1.11).</p>
Chapter 19, Summary	North Kesteven District Council	1 September 2022	<u>19.2.3</u>	

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
			<p>For the reasons set out under Chapter 10, we cannot yet agree that the impacts on Cultural Heritage are not significant as there is still a considerable amount of additional information including the results of archaeological trial trenching (energy park site), geophysics and trial trenching (cable corridor; upon conclusion of the preferred route option) and on the setting and significance of above-ground heritage assets that has still to be presented. At this stage this summary conclusion is premature.</p>	<p>The Applicant notes this comment.</p>

## 16.3 Feedback related to the consultation

Issue Topic	Consultee	Date	Stakeholder Comment	Regard had by the Applicant
Consultation	Historic Railways Estate (National Highways)	1 June 2022	I reviewed the location plan and can confirm that HRE do not have any structures in the provided location. Having said that if you do come across any disused railway structures in the area, please do not hesitate to contact me.	The Applicant notes this comment.
Consultation	UK Power Networks	1 June 2022	UK Power Networks are the Distribution Network Operator for the East, South East and London, therefore, the equipment at your property does not belong to us. Your Distribution Network Operator is Western Power Distribution and you can contact them by calling 0800 096 3080 or via their website: Western Power Distribution - Home	The Applicant notes this comment.
Consultation	NHS Lincolnshire CCG	29 June 2022	The CCG notes the work however we are not in a position to comment at this time.	The Applicant notes this comment.
Consultation	National Air Traffic Services	1 July 2022	We acknowledge receipt of your correspondence dated 28th June 2022 advising of the formal consultation. NATS anticipates no impact from the proposal and has no comments to make on the application.	The Applicant notes this comment.
Consultation	Vodafone	7 July 2022	Please accept this email as confirmation that Vodafone: Fixed does not have apparatus within the vicinity of your proposed works detailed below.	The Applicant notes this comment.
Consultation	East Lindsey District Council	11 July 2022	Thank you for notifying East Lindsey District Council of the statutory consultation on your proposed solar park and energy storage facility at Heckington Fen. I can confirm that this authority has no comments to make on your proposal.	The Applicant notes this comment.

Consultation	Grid Transfer Capability	13 July 2022	I can confirm GTC has no assets in the entire area for the Solar Farm development.	The Applicant notes this comment.
Consultation	Newark and Sherwood District Council	13 July 2022	I can advise that Newark & Sherwood District Council have no comments to make, having regard to the consultation documents provided.	The Applicant notes this comment.
Consultation	Canal and River Trust	15 July 2022	<p>The Trust has reviewed the application and has the following advice:</p> <p>The location of the project and associated cable-line area has been compared with our network, and we do not believe that the proposals as shown in consultation documents would cross land owned or operated by the Trust. Our closest waterway is the River Witham and we therefore have no comment to make on the scheme. Should the scheme be amended to potentially affect the River Witham, we would welcome further consultation on the proposals, so that we can advise about any potential impact for our network.</p> <p>The South Forty Foot Drain is neither owned nor operated by the Trust and we are not Navigation Authority on that waterway.</p>	The Applicant notes this comment.
Consultation	City of Lincoln Council	15 July 2022	Thank you for your consultation on the above and I would confirm that the City of Lincoln Council has no objections to this proposal.	The Applicant notes this comment.
Consultation	North East Lincolnshire Council	19 July 2022	I can confirm that North East Lincolnshire Council has no comments to make.	The Applicant notes this comment.
Consultation	The Coal Authority	19 July 2022	As you are aware, the project site falls outside the coalfield area (as per our previous correspondence to you dated 25 January 2022 - attached) therefore the Coal Authority's Planning team have no specific comments to make on this project.	The Applicant notes this comment.

Consultation	CA Telecom	21 July 2022	We can confirm that Colt Technology Services do not have apparatus near the above location as presented on your submitted plan, if any development or scheme amendments fall outside the 50 metre perimeter new plans must be submitted for review.	The Applicant notes this comment.
Consultation	Norfolk County Council	19 August 2022	I can confirm that we have no comments to make on the proposal.	The Applicant notes this comment.
Consultation	Verizon	19 August 2022	We have reviewed your plans and have determined that Verizon (Formally known as MCI WorldCom, MFS) has no apparatus in the areas concerned.	The Applicant notes this comment.
Consultation	Ministry of Defence	24 August 2022	The application site occupies the statutory safeguarding zones surrounding RAF Conningsby. In particular, the aerodrome height, technical and birdstrike safeguarding zones surrounding the aerodrome and is approx. 11.5km from the centre of the airfield After reviewing the application documents, I can confirm the MOD has no safeguarding objections to this proposal at this stage.	The Applicant notes this comment.
Consultation	Ministry of Defence	24 August 2022	Once further details of the height and scale of the proposed solar park are made available, the MOD wishes to be consulted again in order to perform the appropriate technical assessments.	The Applicant notes this comment. They will let the MOD know when further details are available.
Consultation	Ministry of Defence	24 August 2022	The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's document titled 'Heckington Solar Park Leaflet' and 'Heckington Solar Park Brochure' dated June 2022. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse	The Applicant notes this comment.



			impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.	
Consultation	National Grid Electricity Transmission	25 August 2022	<p>Due to the proximity of some of our assets, NGET wishes to express their interest in further consultation while the impact on our assets is still being assessed.</p> <p>Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and land, this will require appropriate protection and further discussion on the impact to its apparatus and rights.</p> <p>National Grid Electricity Transmission has high voltage electricity overhead transmission lines and substations within or in close proximity to the order boundary.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p> <p>The Applicant notes this comment.</p>
Consultation	North Kesteven District Council	1 September 2022	<p>On the whole we noted that the PEIR acknowledged and addressed the more detailed requirements as set out in the PINS scoping opinion and where relevant (in particular in relation to Chapter 10) confirmed where further information was in preparation and would be presented in the ES accompanying the DCO application. We would welcome the opportunity to review this further information prior to submission if the project timescales allow in order to try and resolve any outstanding issues at pre-application stage.</p>	<p>The Applicant notes this comment.</p>